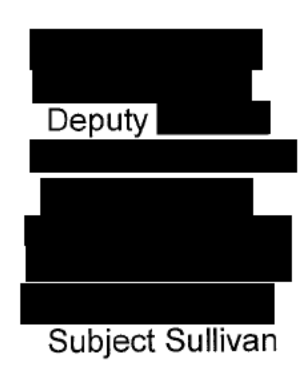
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IV2278603

AUDIO/VIDEO TRACKING SHEET

INVESTIGATIVE SUMMARY

TRANSCRIBED INTERVIEWS



[redacted]

Deputy [redacted]

[redacted]

Subject Sullivan

EXHIBITS

A. I.C.I.B Case Book

B. Envelope containing (2) CD's Containing I.C.I.B. interviews

C. Envelope containing Inmate [redacted] inmate complaints.

D. Photos and sketch of Hawthorn Green Line Parking lot.

MISCELLANEOUS DOCUMENTS

- Administrative rights forms.
- Miscellaneous documents.
- Subjects PPI, EIS printouts.

INTERNAL AFFAIRS BUREAU
INVESTIGATIVE SUMMARY

CASE NUMBER: IV 2278603

SUBJECT: Richard Sullivan, Deputy, [redacted]

STATION/UNIT/BUREAU: Operation Safe Streets Bureau/FOR II

DATE/TIME/DAY: August 14, 2009, Unknown Time, Friday

LOCATION: Unknown location in San Pedro CA

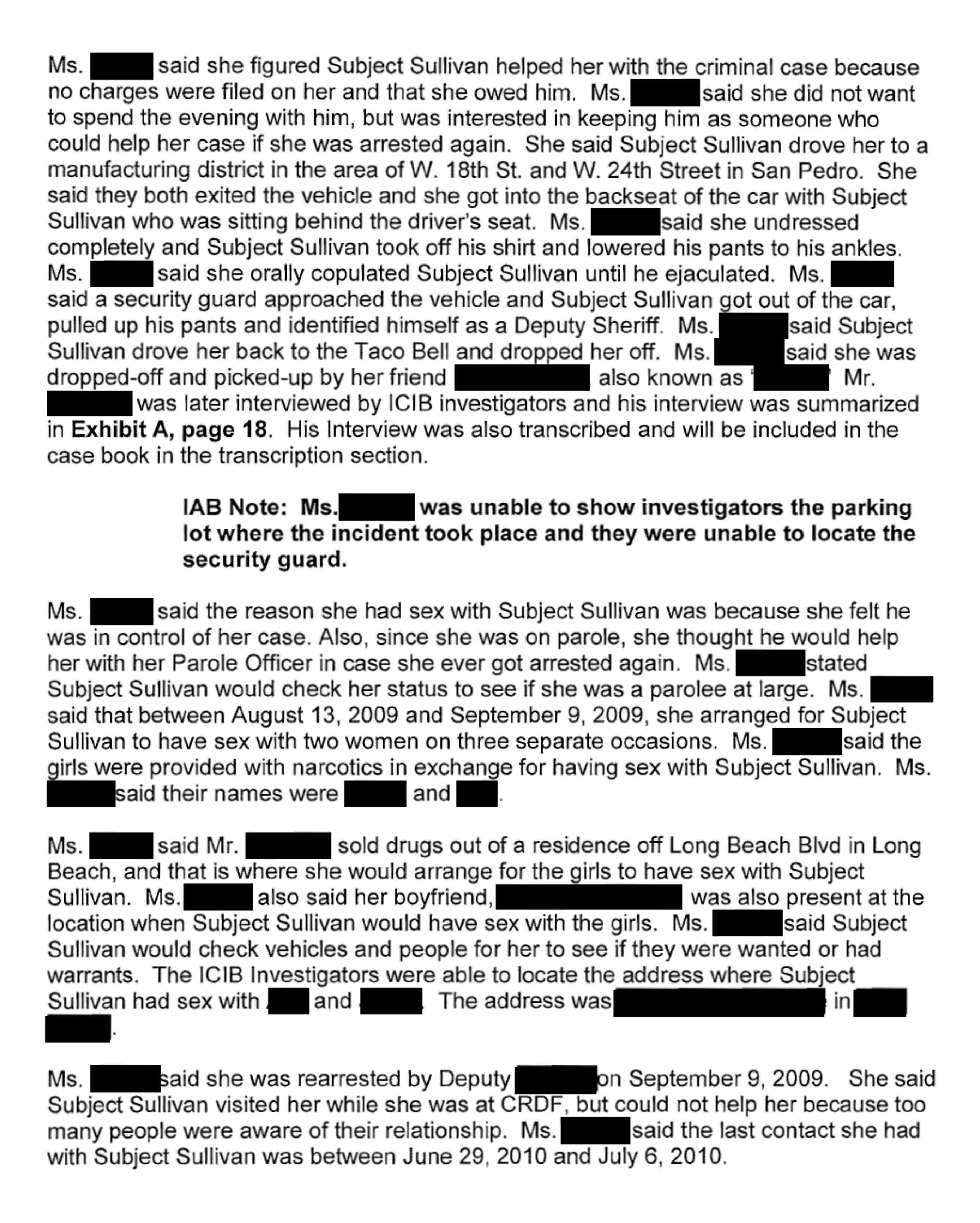
SYNOPSIS:

On July 20, 2010, Internal Criminal Investigation Bureau, Sergeant Kelly G Matthews, [redacted], was assigned to investigate Deputy Richard L Sullivan, [redacted] (here on referred to as Subject Sullivan). It was alleged by Supervising Investigator Leigh Fernstrom from the Los Angeles County District Attorney's Office that Subject Sullivan had sex with females in exchange for leniency in criminal investigations.

The Los Angeles County District Attorney's Office was contacted by Ms. [redacted] alleging acts of misconduct by Subject Sullivan. Sergeant Matthews interviewed Ms. [redacted] and she said she was arrested in June or July of 2009 and was contacted by Subject Sullivan and Deputy [redacted] after her arrest and provided her their cell phone numbers. Ms. [redacted] said Subject Sullivan visited her an additional 3 to 4 times during her one month incarceration at C.R.D.F. Ms. [redacted] said that during the visits, Subject Sullivan began physical contact with her while she was in custody. She said Subject Sullivan would rub her thighs and play "Footsie" with her. Ms. [redacted] said during one of the visits she asked Subject Sullivan to retrieve a camera from her car, which had been impounded. She stated Subject Sullivan agreed and would give her the camera when she was released.

> **IAB Note: During the time of the incident, no logs were kept for inmate visits.**

Ms. [redacted] was released from custody on August 13, 2009 and she made plans to meet Subject Sullivan the following day to retrieve her camera. She said she met Subject Sullivan at a Taco Bell in San Pedro, which was located on South Gaffney Street. Ms. [redacted] said Subject Sullivan arrived in his gray patrol car and was on-duty. Ms. [redacted] said Subject Sullivan gave her the camera and then offered to get a hotel room to have sex. **(During the time of the incident, Subject Sullivan said he did have a grey car assigned to him.)**



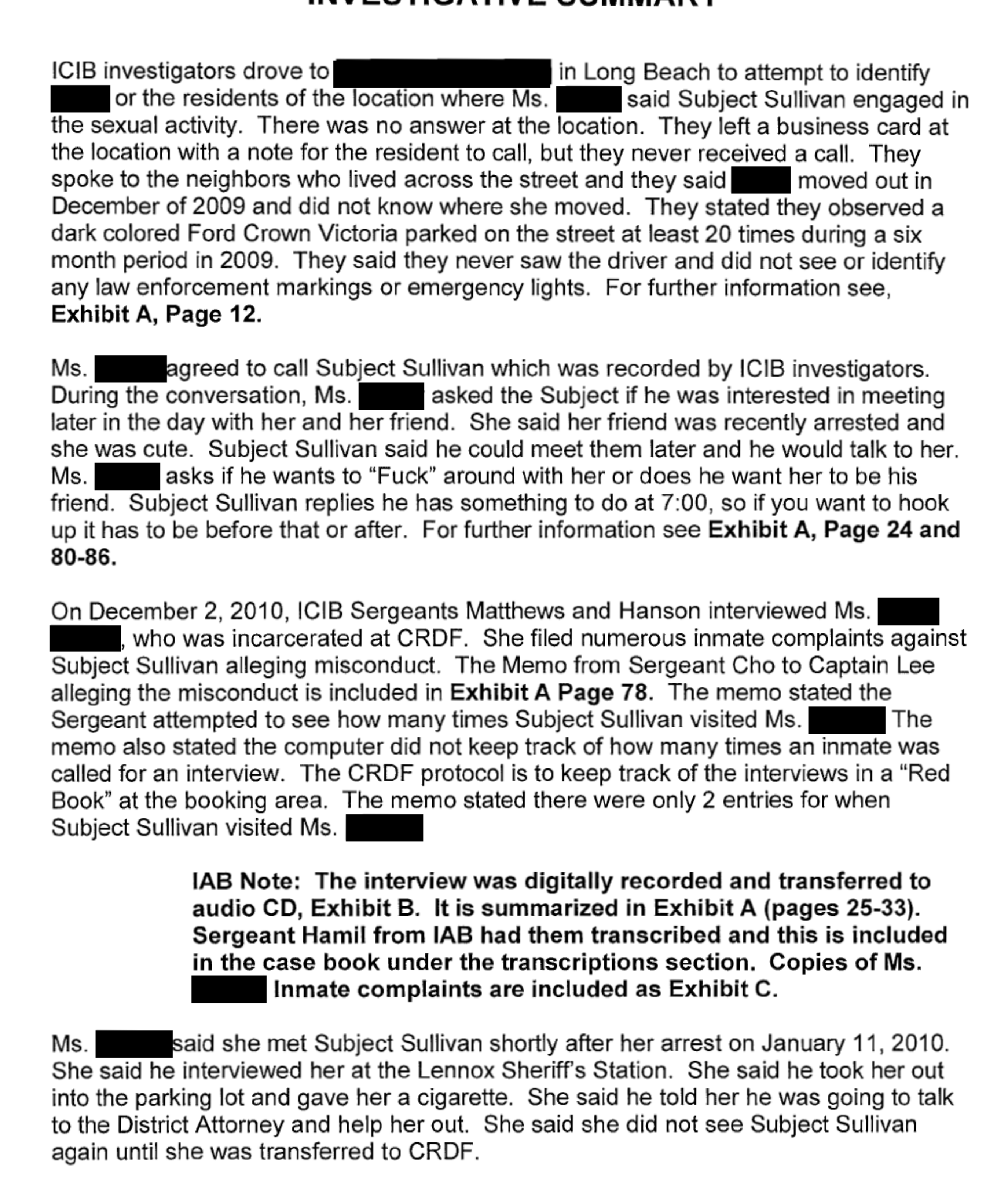
Ms. [redacted] said she figured Subject Sullivan helped her with the criminal case because no charges were filed on her and that she owed him. Ms. [redacted] said she did not want to spend the evening with him, but was interested in keeping him as someone who could help her case if she was arrested again. She said Subject Sullivan drove her to a manufacturing district in the area of W. 18th St. and W. 24th Street in San Pedro. She said they both exited the vehicle and she got into the backseat of the car with Subject Sullivan who was sitting behind the driver's seat. Ms. [redacted] said she undressed completely and Subject Sullivan took off his shirt and lowered his pants to his ankles. Ms. [redacted] said she orally copulated Subject Sullivan until he ejaculated. Ms. [redacted] said a security guard approached the vehicle and Subject Sullivan got out of the car, pulled up his pants and identified himself as a Deputy Sheriff. Ms. [redacted] said Subject Sullivan drove her back to the Taco Bell and dropped her off. Ms. [redacted] said she was dropped-off and picked-up by her friend [redacted] also known as '[redacted].' Mr. [redacted] was later interviewed by ICIB investigators and his interview was summarized in **Exhibit A, page 18**. His Interview was also transcribed and will be included in the case book in the transcription section.

> **IAB Note: Ms. [redacted] was unable to show investigators the parking lot where the incident took place and they were unable to locate the security guard.**

Ms. [redacted] said the reason she had sex with Subject Sullivan was because she felt he was in control of her case. Also, since she was on parole, she thought he would help her with her Parole Officer in case she ever got arrested again. Ms. [redacted] stated Subject Sullivan would check her status to see if she was a parolee at large. Ms. [redacted] said that between August 13, 2009 and September 9, 2009, she arranged for Subject Sullivan to have sex with two women on three separate occasions. Ms. [redacted] said the girls were provided with narcotics in exchange for having sex with Subject Sullivan. Ms. [redacted] said their names were [redacted] and [redacted].

Ms. [redacted] said Mr. [redacted] sold drugs out of a residence off Long Beach Blvd in Long Beach, and that is where she would arrange for the girls to have sex with Subject Sullivan. Ms. [redacted] also said her boyfriend, [redacted] was also present at the location when Subject Sullivan would have sex with the girls. Ms. [redacted] said Subject Sullivan would check vehicles and people for her to see if they were wanted or had warrants. The ICIB Investigators were able to locate the address where Subject Sullivan had sex with [redacted] and [redacted]. The address was [redacted] in [redacted].

Ms. [redacted] said she was rearrested by Deputy [redacted] on September 9, 2009. She said Subject Sullivan visited her while she was at CRDF, but could not help her because too many people were aware of their relationship. Ms. [redacted] said the last contact she had with Subject Sullivan was between June 29, 2010 and July 6, 2010.



ICIB investigators drove to [redacted] in Long Beach to attempt to identify [redacted] or the residents of the location where Ms. [redacted] said Subject Sullivan engaged in the sexual activity. There was no answer at the location. They left a business card at the location with a note for the resident to call, but they never received a call. They spoke to the neighbors who lived across the street and they said [redacted] moved out in December of 2009 and did not know where she moved. They stated they observed a dark colored Ford Crown Victoria parked on the street at least 20 times during a six month period in 2009. They said they never saw the driver and did not see or identify any law enforcement markings or emergency lights. For further information see, **Exhibit A, Page 12.**

Ms. [redacted] agreed to call Subject Sullivan which was recorded by ICIB investigators. During the conversation, Ms. [redacted] asked the Subject if he was interested in meeting later in the day with her and her friend. She said her friend was recently arrested and she was cute. Subject Sullivan said he could meet them later and he would talk to her. Ms. [redacted] asks if he wants to "Fuck" around with her or does he want her to be his friend. Subject Sullivan replies he has something to do at 7:00, so if you want to hook up it has to be before that or after. For further information see **Exhibit A, Page 24 and 80-86.**

On December 2, 2010, ICIB Sergeants Matthews and Hanson interviewed Ms. [redacted], who was incarcerated at CRDF. She filed numerous inmate complaints against Subject Sullivan alleging misconduct. The Memo from Sergeant Cho to Captain Lee alleging the misconduct is included in **Exhibit A Page 78.** The memo stated the Sergeant attempted to see how many times Subject Sullivan visited Ms. [redacted] The memo also stated the computer did not keep track of how many times an inmate was called for an interview. The CRDF protocol is to keep track of the interviews in a "Red Book" at the booking area. The memo stated there were only 2 entries for when Subject Sullivan visited Ms. [redacted]

> **IAB Note: The interview was digitally recorded and transferred to audio CD, Exhibit B. It is summarized in Exhibit A (pages 25-33). Sergeant Hamil from IAB had them transcribed and this is included in the case book under the transcriptions section. Copies of Ms. [redacted] Inmate complaints are included as Exhibit C.**

Ms. [redacted] said she met Subject Sullivan shortly after her arrest on January 11, 2010. She said he interviewed her at the Lennox Sheriff's Station. She said he took her out into the parking lot and gave her a cigarette. She said he told her he was going to talk to the District Attorney and help her out. She said she did not see Subject Sullivan again until she was transferred to CRDF.

Ms. [redacted] said Subject Sullivan began to visit her frequently while at CRDF. She said he would visit up to twice a week. Ms. [redacted] said they would talk about her case and that Subject Sullivan was promising her he would talk to the District Attorney to help her out. She said during the visits, Subject Sullivan began to disclose personal information about himself and his family life. He told her he had cancer and he was separated from his wife and he was lonely. She said he asked her to take his cell phone into the bathroom and photograph herself, so he could have a photo of her. She said she declined. She said on February 14, 2010, Subject Sullivan visited her and asked her to be his girlfriend. She said she agreed because he knew so much about her case and he promised her he could take care of her in jail.

Ms. [redacted] said Subject Sullivan visited her on her birthday, February 25, 2010. She said the visits started to become more intimate. She said during the visit, Subject Sullivan held her hands and he would rub his boot up and down her shin. She said at one point he started poking her palm with his finger. She said it was a street slang for wanting to have intercourse. She said she went to court on March 12, 2010 and she used some methamphetamine she got from another inmate.

She said when she got back to CRDF; Subject Sullivan arrived for a visit. She said she tried to refuse the visit but was told she had to refuse in person. She said she didn't want Subject Sullivan to see her under the influence. She said she met with the Subject in Interview Room 6, which she described as an employee lounge. She said Subject Sullivan put his arms around her waist and kissed her neck and tried to kiss her on the mouth. She said she turned away because she was not attracted to him. She said he continued to squeeze her buttocks with his hands and fondled her right breast on the outside of her clothing. She said she pushed him away but he continued to hold her around the waist. She said she told him to take it slow and she asked him to use his phone to call her sister.

Ms. [redacted] said during one visit in April, 2010, Subject Sullivan slapped her buttocks. She said it made her upset and he told her that it was, "Ok," because she was his girlfriend. Ms. [redacted] said Subject Sullivan brought her a radio that he picked up from her mom and he gave her mom forty dollars to put on her jail account. He also brought her some photos he received from her sister. She said she eventually flushed the radio down the toilet because she didn't want to get caught with it. She said numerous inmates and deputies at CRDF knew of the relationship. She said Subject Sullivan promised her he talked to the District Attorney about getting her a deal.

She said she told her attorney about Subject Sullivan and that he was trying to help her. Ms. [redacted] said she was totally surprised during her preliminary hearing, when Subject Sullivan testified against her and all of the other defendants as the gang expert. He also testified that the crime she was accused of fell under the gang enhancement section. Subject Sullivan's Court transcripts are included in **Exhibit A, page 165.**

Ms. [redacted] said she last had contact with Subject Sullivan in September or October of 2010. She said she called his County cell phone and was angry because he testified against her. She said he visited her the next day and told her he wanted her acquitted, but the investigating officer wanted her convicted. She said the Subject suggested she talk to Homicide Detectives to see if they could help her but she refused. She said she told him at the end of the visit that she did not want to see him again. She said soon after that, the Subject disconnected his phone.

> **IAB Note: Ms. [redacted] is a documented gang member from [redacted] and [redacted] is a documented [redacted] gang member.**

ICIB Investigators accessed the Inmate Telephone Monitoring System (ITMS) and found 12 phone calls placed from inmate housing areas to Subject Sullivan's cell phone numbers that he provided to Ms. [redacted] and Ms. [redacted] All phone calls were recorded and transcribed. **They are included in Exhibit A, (Page 34 and 90-131).** During one phone call recorded on June 6, 2010, Subject Sullivan is heard asking Ms. [redacted] if she was mad at him for slapping her butt and he asks her about the kiss on the neck. She replied she was surprised about the slap but thought the kiss was sexy.

ICIB Investigators had Subject Sullivan's County car examined by Scientific Services Bureau for possible semen, but none was found, **Exhibit A, page 87.** ICIB Investigators also had surveillance evidence of Subject Sullivan's County Car being parked at the Wild Goose Club, where Ms. [redacted] said she met Subject Sullivan on occasion. ICIB Investigators interviewed twenty nine possible witnesses which are summarized in **Exhibit A.** Some were recorded and are included in, **Exhibit B.** All interviews will be summarized in the statement section of the IAB case book and a reference to the corresponding pages in **Exhibit A.**

ICIB Investigators were able to identify one of the girls, [redacted] who was alleged to have had sex with Subject Sullivan. She was identified as [redacted] F/W DOB [redacted] Investigators were able to contact [redacted], who is [redacted] She said she had no idea where her [redacted] might be. The last time she heard, [redacted] was somewhere in the Carson area with [redacted], and both were supposed to be heavy narcotics users. A records check of [redacted] revealed she was last [redacted]

INTERNAL AFFAIRS BUREAU
INVESTIGATIVE SUMMARY

On December 13, 2010, Sergeant Matthews and Captain Carey interviewed Subject Sullivan. The Interview was summarized in **Exhibit A, (Pages 36-47).**

> **IAB Note: The interview was digitally recorded and copied to audio CD, Exhibit B. Sergeant Hamil from IAB had it transcribed and this is included in the case book under the transcription section.**

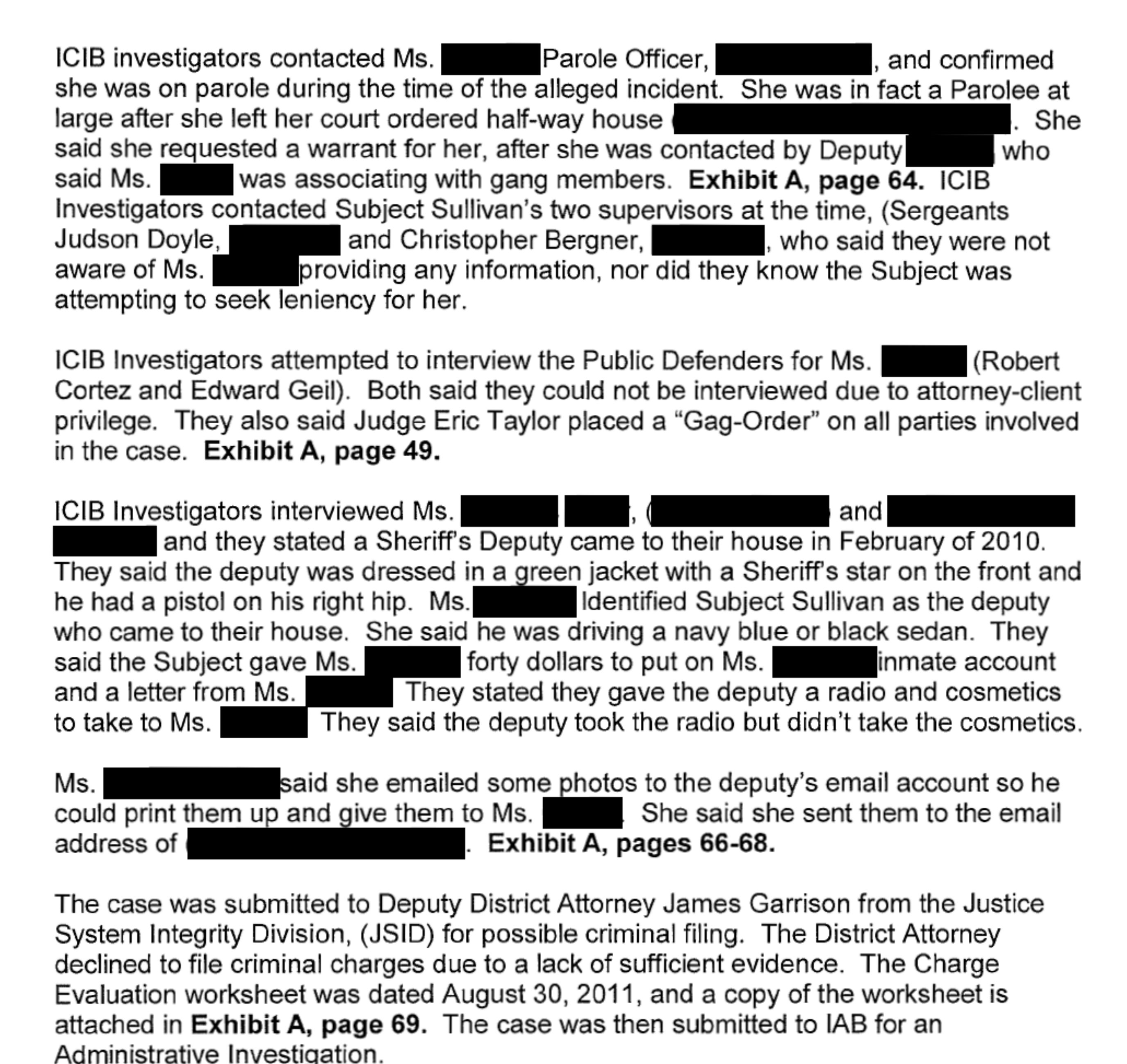
Subject Sullivan stated during his ICIB interview, he tried to cultivate Ms. [redacted] and Ms. [redacted] as unpaid informants in his investigation into the [redacted] gang. He said he met with Ms. [redacted] after she was released from custody, but it was only to obtain information on the gang. He said he did meet with Ms. [redacted] at various locations both on and off-duty. He initially said he had no intimate contact with Ms. [redacted] but later in the interview he admitted to receiving oral sex from Ms. [redacted] He denied ever having sex at the house on [redacted]. He did admit to meeting Ms. [redacted] at the "Wild Goose" club and driving his County car there while off-duty. He said he may have consumed alcohol while at the club.

Subject Sullivan said his contact with Ms. [redacted] was only when she was in custody. He stated he was trying to get information on the "[redacted] gang. He said that Ms. [redacted] thought their relationship was going somewhere. He said he never did anything inappropriate with her, but Ms. [redacted] attempted to kiss him on the mouth during one visit. He said he didn't kiss her back and he told her to stop. He was asked about the recorded phone calls where he said he kissed her neck and slapped her butt. He said he didn't recall kissing her on the neck or touching her butt. Later in the interview, he told the Investigators he may have retuned her kiss and might have kissed her neck.

Subject Sullivan was asked if he brought anything into the jail for Ms. [redacted] He said he did not. He said he took a letter to Ms. [redacted] family and agreed to take an MP3 player back to her, but he never did. He said he took some photos to Ms. [redacted] which were sent to him via email from Ms. [redacted] sister.

He was asked if he tried to work out a deal for Ms. [redacted] He said he made contact with Deputy District Attorney Collado, and that with the recommendation from the Sheriff's Department, Ms. [redacted] sentence might be reduced to ten years. He said the D.A. would have to meet with her supervisor and the D.A. decided against the offer.

He was asked if there would be any reason for his DNA would be in the backseat of his County car and he said that he and his wife had sex in the backseat in 2009. For the complete interview, refer to his transcribed interview in the case book.



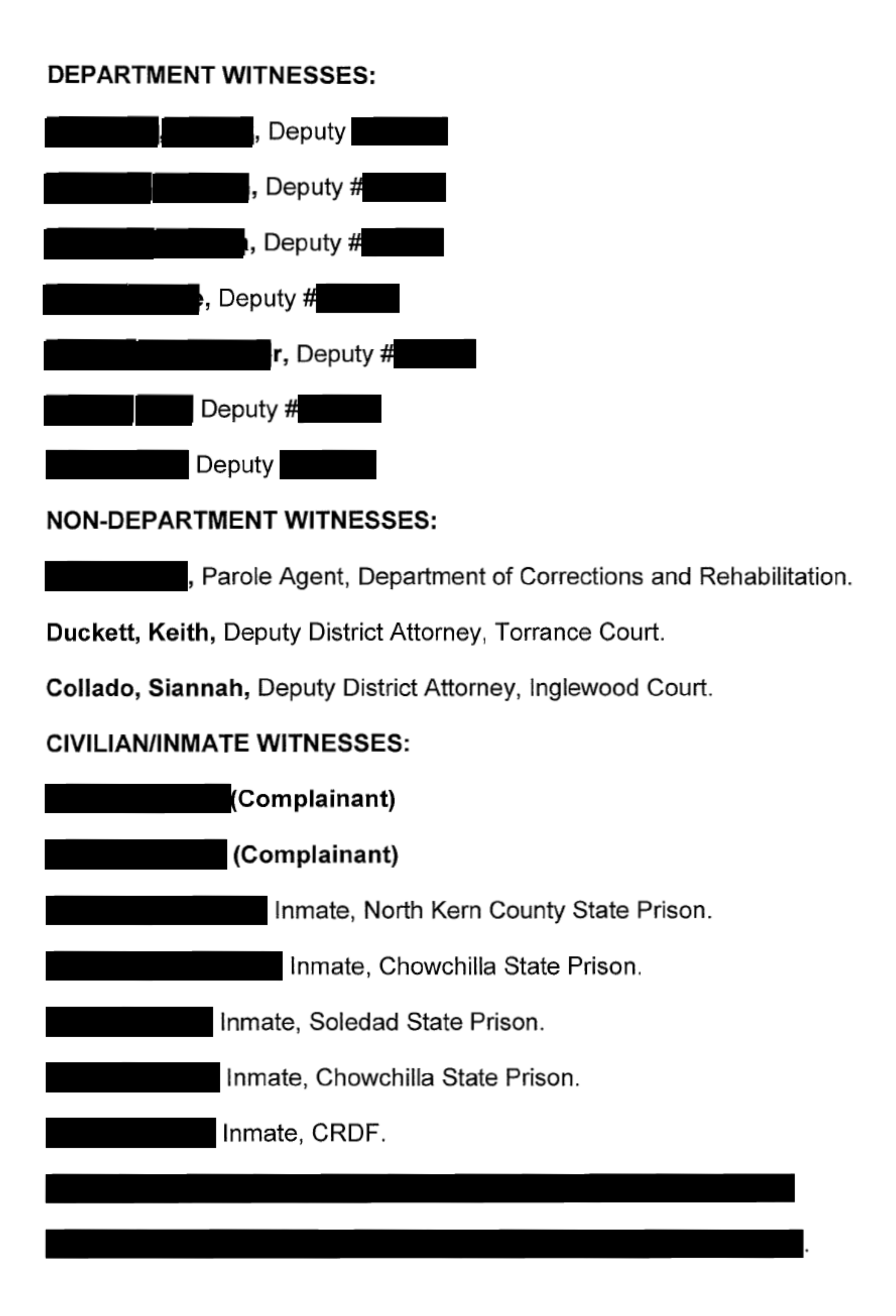
ICIB investigators contacted Ms. [redacted] Parole Officer, [redacted], and confirmed she was on parole during the time of the alleged incident. She was in fact a Parolee at large after she left her court ordered half-way house [redacted]. She said she requested a warrant for her, after she was contacted by Deputy [redacted] who said Ms. [redacted] was associating with gang members. **Exhibit A, page 64.** ICIB Investigators contacted Subject Sullivan's two supervisors at the time, (Sergeants Judson Doyle, [redacted] and Christopher Bergner, [redacted], who said they were not aware of Ms. [redacted] providing any information, nor did they know the Subject was attempting to seek leniency for her.

ICIB Investigators attempted to interview the Public Defenders for Ms. [redacted] (Robert Cortez and Edward Geil). Both said they could not be interviewed due to attorney-client privilege. They also said Judge Eric Taylor placed a "Gag-Order" on all parties involved in the case. **Exhibit A, page 49.**

ICIB Investigators interviewed Ms. [redacted] [redacted], ([redacted] and [redacted] and they stated a Sheriff's Deputy came to their house in February of 2010. They said the deputy was dressed in a green jacket with a Sheriff's star on the front and he had a pistol on his right hip. Ms. [redacted] Identified Subject Sullivan as the deputy who came to their house. She said he was driving a navy blue or black sedan. They said the Subject gave Ms. [redacted] forty dollars to put on Ms. [redacted] inmate account and a letter from Ms. [redacted] They stated they gave the deputy a radio and cosmetics to take to Ms. [redacted] They said the deputy took the radio but didn't take the cosmetics.

Ms. [redacted] said she emailed some photos to the deputy's email account so he could print them up and give them to Ms. [redacted] She said she sent them to the email address of [redacted]. **Exhibit A, pages 66-68.**

The case was submitted to Deputy District Attorney James Garrison from the Justice System Integrity Division, (JSID) for possible criminal filing. The District Attorney declined to file criminal charges due to a lack of sufficient evidence. The Charge Evaluation worksheet was dated August 30, 2011, and a copy of the worksheet is attached in **Exhibit A, page 69.** The case was then submitted to IAB for an Administrative Investigation.



DEPARTMENT WITNESSES:

[redacted], Deputy [redacted]

[redacted], Deputy #[redacted]

[redacted], Deputy #[redacted]

[redacted], Deputy #[redacted]

[redacted], Deputy #[redacted]

[redacted] Deputy #[redacted]

[redacted] Deputy [redacted]

NON-DEPARTMENT WITNESSES:

[redacted], Parole Agent, Department of Corrections and Rehabilitation.

Duckett, Keith, Deputy District Attorney, Torrance Court.

Collado, Siannah, Deputy District Attorney, Inglewood Court.

CIVILIAN/INMATE WITNESSES:

[redacted] **(Complainant)**

[redacted] **(Complainant)**

[redacted] Inmate, North Kern County State Prison.

[redacted] Inmate, Chowchilla State Prison.

[redacted] Inmate, Soledad State Prison.

[redacted] Inmate, Chowchilla State Prison.

[redacted] Inmate, CRDF.

[redacted].

STATEMENT SUMMARIES:

COMPLAINANT:

Ms. [redacted] was interviewed by Sergeant Scott Craig from ICIB, on July 20, 2010. The Interview was digitally recorded.

> **IAB Note: The Interview was summarized and is included in Exhibit A, pages 2-8. The interview was copied to audio CD and is included in Exhibit B. Sergeant Hamil from IAB had the interview transcribed and it is included in the IAB case book in the transcription section.**

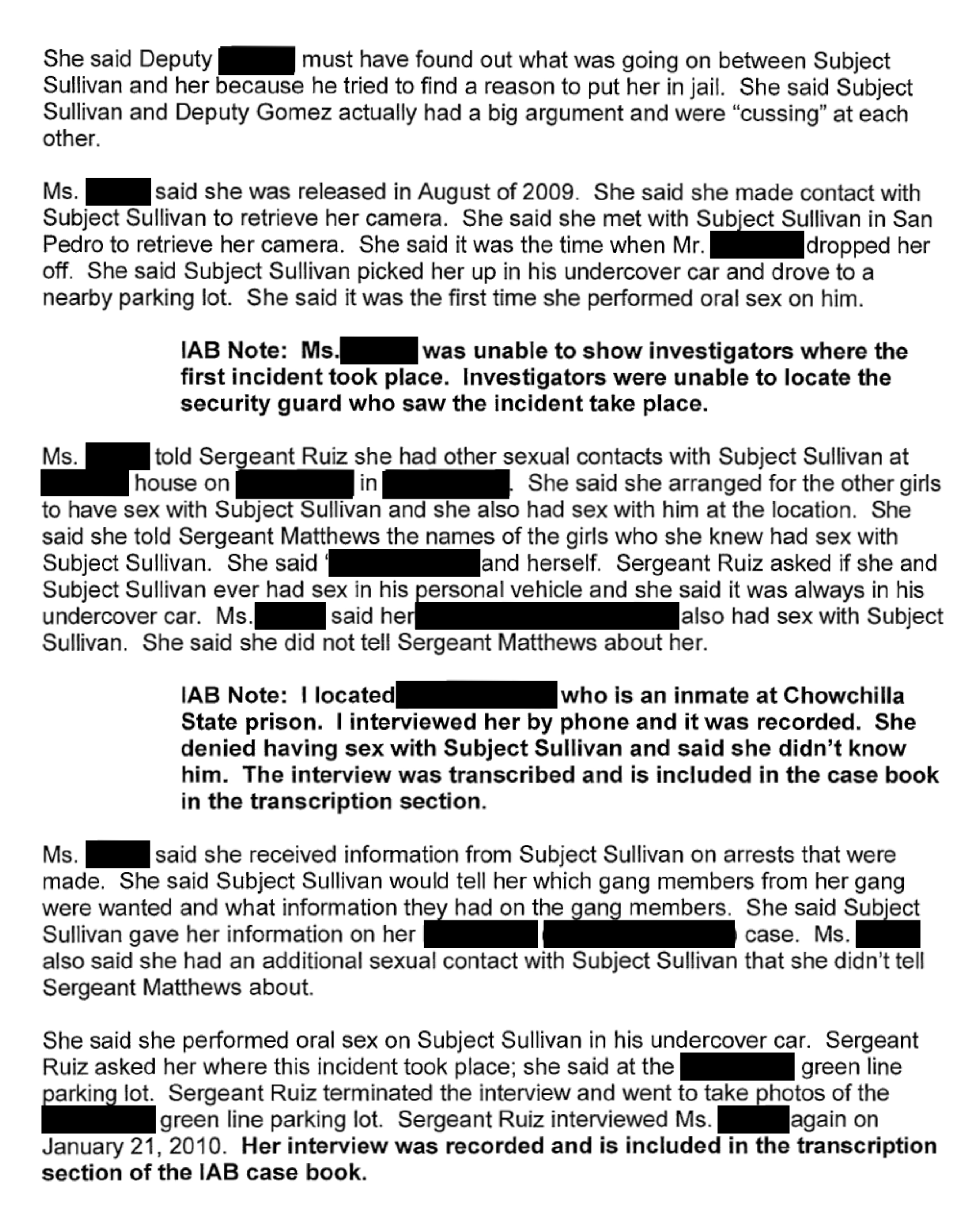
Ms. [redacted] was re-interviewed by Sergeant Teri Ruiz from IAB on January 12, 2012. The Interview took place at CRDF and was digitally recorded. The interview was transcribed and is included in the transcription section of the IAB case book.

Ms. [redacted] stated, as she did in her ICIB interview, that she met Subject Sullivan after her arrest in May 2009. She stated she was arrested and Subject Sullivan and Deputy [redacted] came to CRDF to interview her. She said her case was dropped but she was held for a parole violation.

She said Subject Sullivan started to visit her 2-3 times a week while she was in the County Jail. She said Subject Sullivan would visit her most of the time by himself, without Deputy [redacted]. She said during the visits, she would ask him to get her camera out of her car which had been towed, because she knew it would be sold after thirty days. She said Subject Sullivan agreed to get the camera from her car and she could pick it up after her release. She said when Subject Sullivan came to interview her with Deputy [redacted] they would try to get information on her gang, ([redacted] She said she has been affiliated with [redacted] for twenty years.

Ms. [redacted] said nothing inappropriate happened while Deputy [redacted] was with Subject Sullivan; they were just trying to get information from her on her gang. She said Subject Sullivan, began to ask questions about another girl from [redacted] named [redacted]. She said she found out later when [redacted] was released from jail that Subject Sullivan was having an affair with her.

Ms. [redacted] said, during one visit at CRDF, Deputy [redacted] left the room and Subject Sullivan started playing "footsie" with her. She also said he would rub her leg. She said Deputy [redacted] did not know it was occurring. She said she provided a lot of information on her gang and that is why she never got charged. She said Subject Sullivan visited her approximately 18 times. She said she provided him with information on the first four or five visits.



She said Deputy [redacted] must have found out what was going on between Subject Sullivan and her because he tried to find a reason to put her in jail. She said Subject Sullivan and Deputy Gomez actually had a big argument and were "cussing" at each other.

Ms. [redacted] said she was released in August of 2009. She said she made contact with Subject Sullivan to retrieve her camera. She said she met with Subject Sullivan in San Pedro to retrieve her camera. She said it was the time when Mr. [redacted] dropped her off. She said Subject Sullivan picked her up in his undercover car and drove to a nearby parking lot. She said it was the first time she performed oral sex on him.

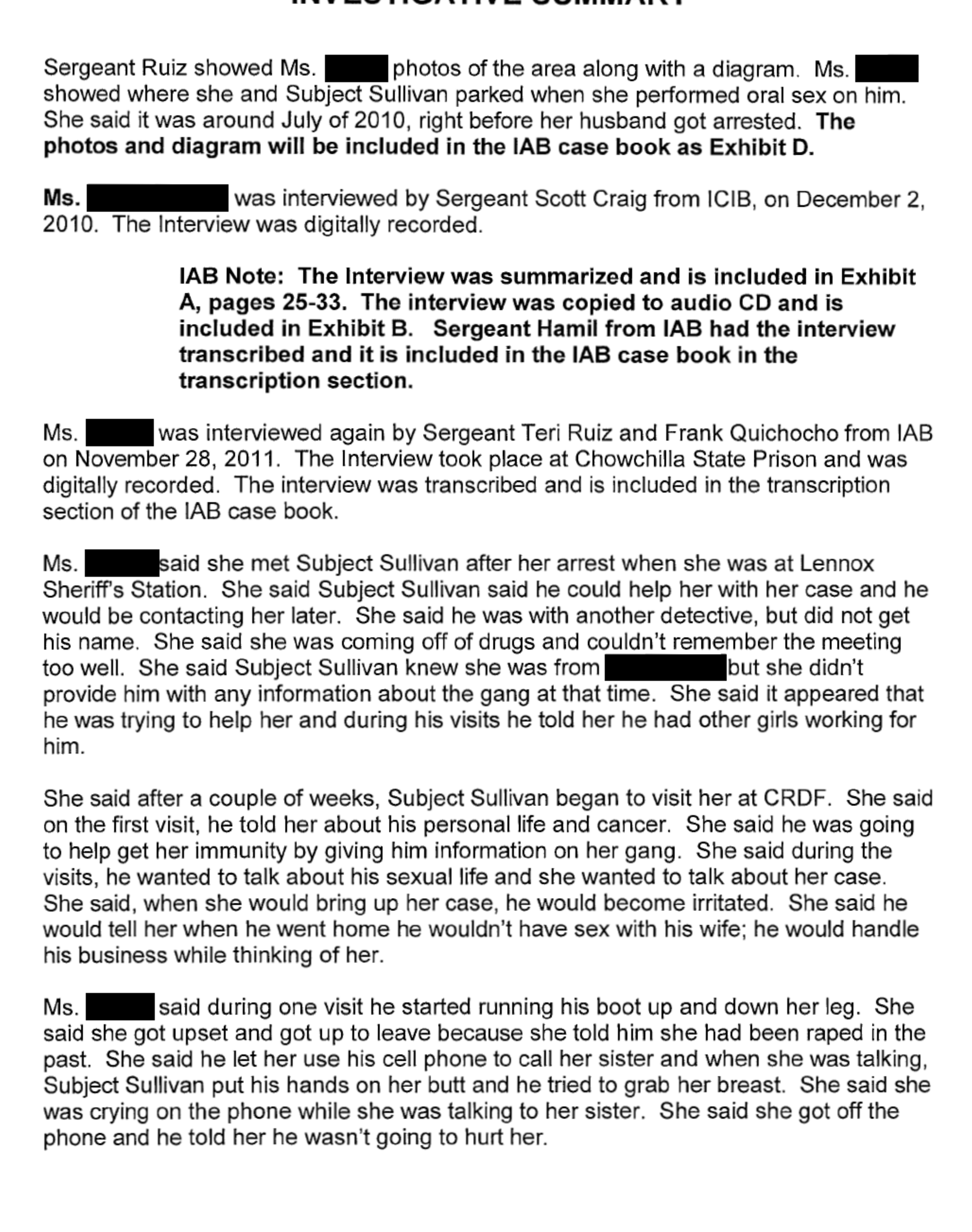
> **IAB Note: Ms. [redacted] was unable to show investigators where the first incident took place. Investigators were unable to locate the security guard who saw the incident take place.**

Ms. [redacted] told Sergeant Ruiz she had other sexual contacts with Subject Sullivan at [redacted] house on [redacted] in [redacted]. She said she arranged for the other girls to have sex with Subject Sullivan and she also had sex with him at the location. She said she told Sergeant Matthews the names of the girls who she knew had sex with Subject Sullivan. She said "[redacted] and herself. Sergeant Ruiz asked if she and Subject Sullivan ever had sex in his personal vehicle and she said it was always in his undercover car. Ms. [redacted] said her [redacted] also had sex with Subject Sullivan. She said she did not tell Sergeant Matthews about her.

> **IAB Note: I located [redacted] who is an inmate at Chowchilla State prison. I interviewed her by phone and it was recorded. She denied having sex with Subject Sullivan and said she didn't know him. The interview was transcribed and is included in the case book in the transcription section.**

Ms. [redacted] said she received information from Subject Sullivan on arrests that were made. She said Subject Sullivan would tell her which gang members from her gang were wanted and what information they had on the gang members. She said Subject Sullivan gave her information on her [redacted] ([redacted]) case. Ms. [redacted] also said she had an additional sexual contact with Subject Sullivan that she didn't tell Sergeant Matthews about.

She said she performed oral sex on Subject Sullivan in his undercover car. Sergeant Ruiz asked her where this incident took place; she said at the [redacted] green line parking lot. Sergeant Ruiz terminated the interview and went to take photos of the [redacted] green line parking lot. Sergeant Ruiz interviewed Ms. [redacted] again on January 21, 2010. **Her interview was recorded and is included in the transcription section of the IAB case book.**



Sergeant Ruiz showed Ms. [redacted] photos of the area along with a diagram. Ms. [redacted] showed where she and Subject Sullivan parked when she performed oral sex on him. She said it was around July of 2010, right before her husband got arrested. **The photos and diagram will be included in the IAB case book as Exhibit D.**

Ms. [redacted] was interviewed by Sergeant Scott Craig from ICIB, on December 2, 2010. The Interview was digitally recorded.

> **IAB Note: The Interview was summarized and is included in Exhibit A, pages 25-33. The interview was copied to audio CD and is included in Exhibit B. Sergeant Hamil from IAB had the interview transcribed and it is included in the IAB case book in the transcription section.**

Ms. [redacted] was interviewed again by Sergeant Teri Ruiz and Frank Quichocho from IAB on November 28, 2011. The Interview took place at Chowchilla State Prison and was digitally recorded. The interview was transcribed and is included in the transcription section of the IAB case book.

Ms. [redacted] said she met Subject Sullivan after her arrest when she was at Lennox Sheriff's Station. She said Subject Sullivan said he could help her with her case and he would be contacting her later. She said he was with another detective, but did not get his name. She said she was coming off of drugs and couldn't remember the meeting too well. She said Subject Sullivan knew she was from [redacted] but she didn't provide him with any information about the gang at that time. She said it appeared that he was trying to help her and during his visits he told her he had other girls working for him.

She said after a couple of weeks, Subject Sullivan began to visit her at CRDF. She said on the first visit, he told her about his personal life and cancer. She said he was going to help get her immunity by giving him information on her gang. She said during the visits, he wanted to talk about his sexual life and she wanted to talk about her case. She said, when she would bring up her case, he would become irritated. She said he would tell her when he went home he wouldn't have sex with his wife; he would handle his business while thinking of her.

Ms. [redacted] said during one visit he started running his boot up and down her leg. She said she got upset and got up to leave because she told him she had been raped in the past. She said he let her use his cell phone to call her sister and when she was talking, Subject Sullivan put his hands on her butt and he tried to grab her breast. She said she was crying on the phone while she was talking to her sister. She said she got off the phone and he told her he wasn't going to hurt her.

She said he tried to make a sexual advance and she had to push him away. She said her Public Defender knew about the Subject talking to her and even made a comment to her "Like your boyfriend is over there." She said she never told her attorney about the physical contact. She said Subject Sullivan would keep telling her he had to wait for the head District Attorney to help her and then the head D.A. was not willing to help her.

Ms. [redacted] said the Subject would visit her twice a week from February until September, 2010. She said the Subject told her, she would have to testify against her co-defendants. She said she never provided any information to anyone that would help law enforcement. She said some of the deputies at CRDF began to make comments to her like "Your little boyfriend's here." She said her cellmate [redacted], told the deputies at CRDF about her relationship with the Subject.

She said she was approached by two deputies and they asked her what was going on with the detective. She said the two Deputies were [redacted] and [redacted] She said the Subject got her moved out of her housing area to 2200, the "Getting out by Going In," program. She said around her birthday, February 25, 2010, Subject Sullivan visited her around 7:00 P.M. She said he stopped by her mom's house and gave her forty dollars to put on Ms. [redacted] inmate account, because he was not allowed. She said it was on the same visit that he began to rub his boot up her pants. She said he also picked up other items for her like a radio, food and cosmetics. She was asked if he brought the items to her and she said he did.

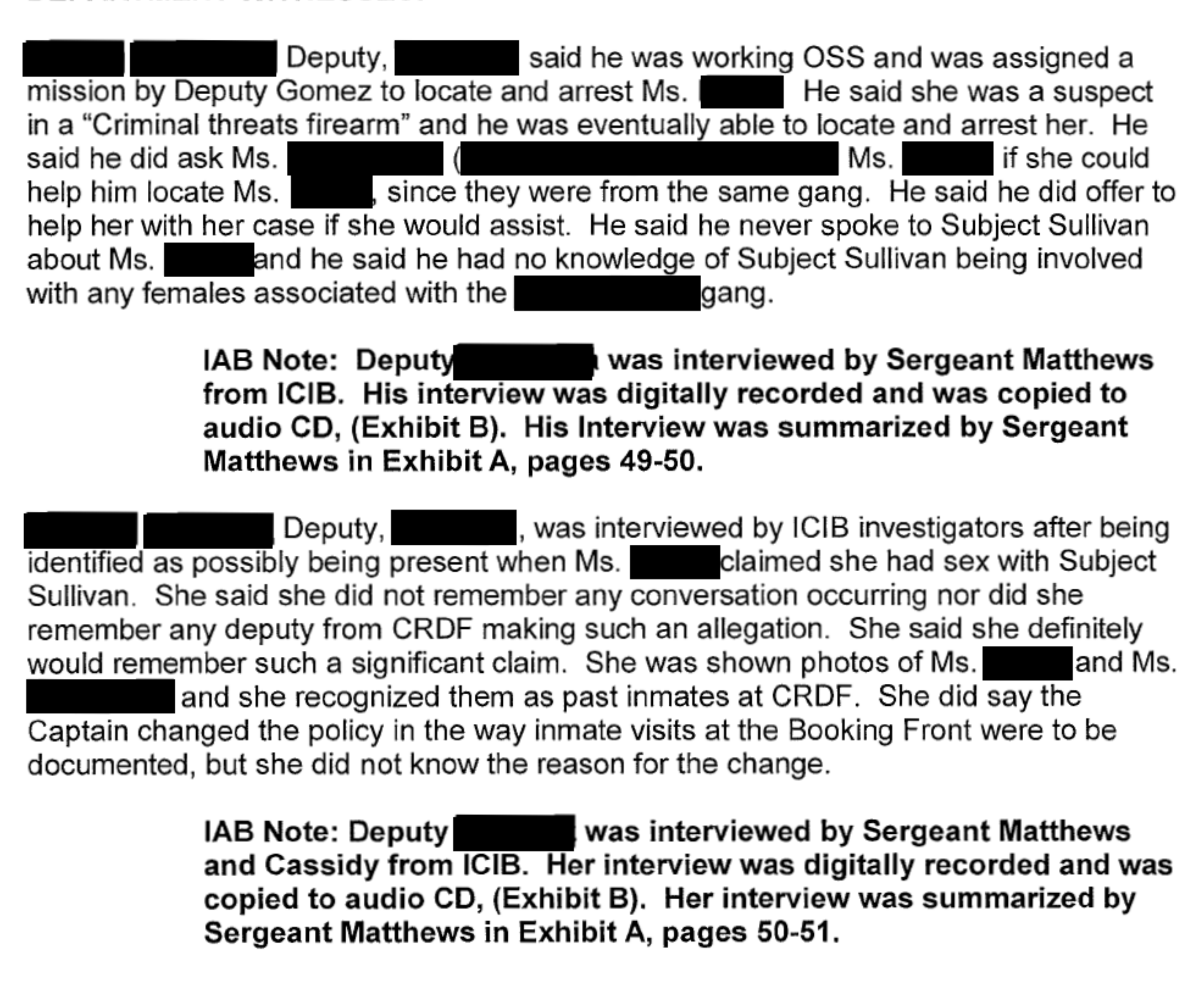
She was asked about the recorded phone calls from CRDF and Subject Sullivan. She was asked approximately how many times she called him and she said about eight. She was asked what numbers she called and she said his cell phone and his desk phone. She was asked if Subject Sullivan ever visited her at court and she said he visited her at Inglewood Court. She was asked what happened after court. She said Subject Sullivan visited her at CRDF and they went to interview room number six.

She said Subject Sullivan let her use his phone again and while she was talking to her sister, he kissed her and put his left hand on her butt and right hand on her breast. She said she pushed him away and he sat down and he was groping his penis. She said he was trying to hide his erection.

She was asked if she ever allowed Subject Sullivan to touch her and she said "No," she said she would allow him to rub his boot up her leg. She said she had nothing else to offer him to keep him helping her. She said when he would grab her, she felt like a prostitute. She was asked if she was ever attracted to him and she said "No," she tried to fool herself into it because she felt that he was the only one helping her out. She said he was putting money on her books and talking to the District Attorney, so she felt she had to pay him one way or another.

She said she just wasn't ready for it, which is why she almost slapped him when he spanked her butt. She was asked if she told anyone about his behavior and she said just her cellmates. She did tell two sergeants that she didn't want to see him anymore and they said "Ok," but they didn't ask why. She said she felt like she just dug herself into a hole, because Subject Sullivan testified against her at the preliminary hearing. She said she tried to call him sometime after the court date, but he had disconnected all of his phones.

DEPARTMENT WITNESSES:



[redacted] [redacted] Deputy, [redacted] said he was working OSS and was assigned a mission by Deputy Gomez to locate and arrest Ms. [redacted] He said she was a suspect in a "Criminal threats firearm" and he was eventually able to locate and arrest her. He said he did ask Ms. [redacted] ([redacted] Ms. [redacted] if she could help him locate Ms. [redacted], since they were from the same gang. He said he did offer to help her with her case if she would assist. He said he never spoke to Subject Sullivan about Ms. [redacted] and he said he had no knowledge of Subject Sullivan being involved with any females associated with the [redacted] gang.

> **IAB Note: Deputy [redacted] was interviewed by Sergeant Matthews from ICIB. His interview was digitally recorded and was copied to audio CD, (Exhibit B). His Interview was summarized by Sergeant Matthews in Exhibit A, pages 49-50.**

[redacted] [redacted] Deputy, [redacted], was interviewed by ICIB investigators after being identified as possibly being present when Ms. [redacted] claimed she had sex with Subject Sullivan. She said she did not remember any conversation occurring nor did she remember any deputy from CRDF making such an allegation. She said she definitely would remember such a significant claim. She was shown photos of Ms. [redacted] and Ms. [redacted] and she recognized them as past inmates at CRDF. She did say the Captain changed the policy in the way inmate visits at the Booking Front were to be documented, but she did not know the reason for the change.

> **IAB Note: Deputy [redacted] was interviewed by Sergeant Matthews and Cassidy from ICIB. Her interview was digitally recorded and was copied to audio CD, (Exhibit B). Her interview was summarized by Sergeant Matthews in Exhibit A, pages 50-51.**

[redacted] Deputy, [redacted] was interviewed by Sergeant Matthews and Cassidy from ICIB. She was identified by Ms. [redacted] as the deputy who discovered the photos brought to her by Subject Sullivan. Deputy Saucedo said she remembered finding some photos of Ms. [redacted] (Ms. [redacted] cellmate) and her child. She said she couldn't remember if she found them on Ms. [redacted] or in the cell. She said she asked Ms. [redacted] how she obtained them, and she was told she received them during a visit in Booking Front. Deputy [redacted] was asked who visits at Booking Front, and she said inmates who have detective and attorney visits.

She was asked if she ever found any contraband on Ms. [redacted] when she was an inmate and she said she had not. She said Ms. [redacted] had once said a Lennox detective was trying to make her a "Snitch." She said she never heard Ms. [redacted] say that anything inappropriate was going on. She said she asked Ms. [redacted] who was visiting her and she was told the name but she could not remember it. She was asked if she ever made or heard the comments of "Hey, [redacted] Your man is here." Deputy [redacted] said she did not, but if she did she would have made inquiries into it. Sergeant Matthews revealed Subject Sullivan's name on a piece of paper and she immediately recognized it as the detective who was visiting Ms. [redacted]

> **IAB Note: For further information, see Sergeant Matthews' summary of the interview, (Exhibit A, pages 51-53). Deputy [redacted] interview was digitally recorded and copied to audio CD, (Exhibit B).**

[redacted] Deputy, [redacted] was interviewed by Sergeants Matthews and Cassidy from ICIB. She was identified by Ms. [redacted] as being present when Ms. [redacted] claimed to have had sex with Subject Sullivan. She was shown photographs of Ms. [redacted], Ms. [redacted], and Ms. [redacted] and asked if she recognized any of them as past inmates. Deputy [redacted] said she did not recognize them. She was asked if she ever heard of an inmate claim she had sex with a Department employee. [redacted], (Sergeant Matthews determined the incident was not involving Subject Sullivan and had been previously investigated). She was asked about any unusual patterns or frequency of visits for inmates at Booking Front and she said she did not.

> **IAB Note: For further information, see Sergeant Matthews' summary of the interview, (Exhibit A, pages 55-56). Deputy Kisner's interview was digitally recorded and copied to audio CD, (Exhibit B).**

[redacted] Deputy, [redacted] was interviewed by Sergeant Matthews from ICIB and Deputy [redacted] was the handling Detective on Ms. [redacted] case. All reports associated to Ms. [redacted] case are included in **Exhibit A, (pages 134-164)**.

Deputy [redacted] said he was working as the night detective at Lennox Station and responded to the robbery involving Ms. [redacted] on December 26, 2009. He said he assisted the handling patrol unit and took the case as the Investigating Detective. He said he contacted OSS Detective Sullivan, (Subject Sullivan) to see if he wanted the handle on the case since it involved gang members. He said Subject Sullivan declined but offered to assist him in identifying possible suspects. He said Subject Sullivan used an informant [redacted], and they were able to identify Ms. [redacted] as one of the female suspects. He was asked since he was the handling Investigator if all information regarding the case should be reviewed by him first and he said "Absolutely."

He was asked if he knew anything about a fake gun being used and he said not until he heard it from one of the District Attorneys. He also said it was at that time he heard Subject Sullivan was also under some type of investigation. He said he was not aware of any plea deals being negotiated by OSS Detectives. He said he was not aware of any connection between Subject Sullivan and Ms. [redacted] until he heard of the investigation of Subject Sullivan. He said he was approached by Subject Sullivan and he asked Deputy [redacted] if he would like to transfer the case to him. He said after he declined to turn the case over, Subject Sullivan offered to introduce him to the confidential informant, Ms. [redacted]

Deputy [redacted] said he found out later, also through the District Attorney, that Subject Sullivan had taken Ms. [redacted] out of the jail at Lennox and interviewed her about the crime. He said he was not aware that Subject Sullivan was visiting Ms. [redacted] while she was in custody at CRDF.

> **IAB Note: For further information, see Sergeant Matthews' summary of the interview, (Exhibit A, pages 56-59). Deputy [redacted]'s interview was digitally recorded and copied to an audio CD, (Exhibit B).**

[redacted] Deputy, [redacted] was interviewed by Sergeant Matthews from ICIB. He said he was assigned to the [redacted] targeting the [redacted] gang. [redacted] He said he was [redacted] as a [redacted]. He said he knew Subject Sullivan as an OSS detective and Ms. [redacted] as a [redacted] gang member.

He said Ms. [redacted] was not an informant and was not aware of any information she had provided. He was asked if Subject Sullivan could have worked with some other [redacted] and he said it would have not been possible because he would have been the person facilitating the passing of information.

IAB Note: For further information, see Sergeant Matthews' summary of the interview, (Exhibit A, page 63). Deputy [redacted] interview was not digitally recorded.

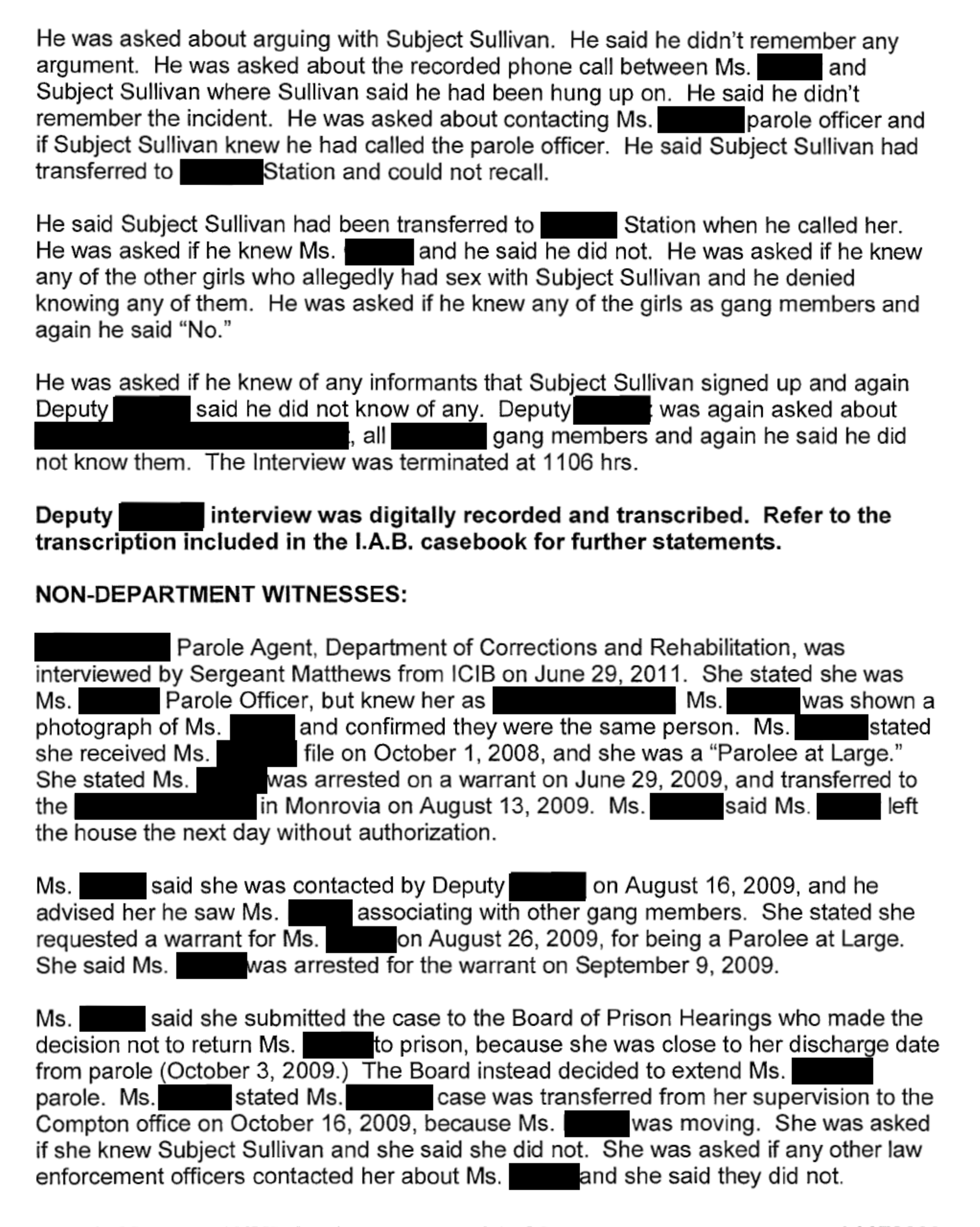
[redacted] Deputy, [redacted] was interviewed by Sergeants Teri Ruiz and Sonia Bracken from the Internal Affairs Bureau on January 24, 2012. The interview took place at the Internal Affairs Bureau, Interview room B. Deputy [redacted] was represented by Adam Marangell Attorney at Law.

Deputy [redacted] said he transferred to GET/OSS in [redacted] and has been an OSS Investigator for approximately the last three years. He said he has known Subject Sullivan since they went to the Academy together. He described his relationship with Subject Sullivan as a "working relationship." He said he worked as Subject Sullivan's partner for over a year and last spoke to him right after he was transferred to [redacted] at the [redacted] He said he does not socialize with him off-duty and has not discussed the case with him.

He was asked about Ms. [redacted] and how they knew her. He stated he knew her by her gang name of [redacted]," and she was wanted for questioning regarding a [redacted] He said she was a documented member of [redacted] and [redacted] He said she is a [redacted]. He was asked if Subject Sullivan was aware of all of the information regarding Ms. [redacted] He said as far as her being a [redacted], and gang member, "yes he was." He was asked if Ms. [redacted] was on parole and he said she was on parole. She was arrested for a parole violation. He was his partner, so he had to know. He was asked if they ever went back to the tow yard and retrieved property out of the car and he said not that he was aware of.

He was asked if he knew if Subject Sullivan was having inappropriate relationships with females. He said he heard Subject Sullivan had a girlfriend who was about [redacted] years old. He said he didn't know her name. He was asked if Ms. [redacted] was an informant and he said "No." He was asked if he knew if Subject Sullivan was having a sexual relationship with her and he said "No."

He was asked how many times he saw Ms. [redacted] and he said three times, he arrested her twice and interviewed her one time. He said the interview was at CRDF in 2008 or 2009. The interview was regarding her pointing a gun at a guy and Subject Sullivan was with him. He was asked if Subject Sullivan treated Ms. [redacted] different from other suspects and he said "No," not that he recalled. He was asked if he ran her criminal history and if he did how many times? He said three to four times. He was asked if she was on parole and he said she was. He was asked if they took photos of her while she was in custody and he didn't think so.



He was asked about arguing with Subject Sullivan. He said he didn't remember any argument. He was asked about the recorded phone call between Ms. [redacted] and Subject Sullivan where Sullivan said he had been hung up on. He said he didn't remember the incident. He was asked about contacting Ms. [redacted] parole officer and if Subject Sullivan knew he had called the parole officer. He said Subject Sullivan had transferred to [redacted] Station and could not recall.

He said Subject Sullivan had been transferred to [redacted] Station when he called her. He was asked if he knew Ms. [redacted] and he said he did not. He was asked if he knew any of the other girls who allegedly had sex with Subject Sullivan and he denied knowing any of them. He was asked if he knew any of the girls as gang members and again he said "No."

He was asked if he knew of any informants that Subject Sullivan signed up and again Deputy [redacted] said he did not know of any. Deputy [redacted] was again asked about [redacted], all [redacted] gang members and again he said he did not know them. The Interview was terminated at 1106 hrs.

Deputy [redacted] interview was digitally recorded and transcribed. Refer to the transcription included in the I.A.B. casebook for further statements.

NON-DEPARTMENT WITNESSES:

[redacted] Parole Agent, Department of Corrections and Rehabilitation, was interviewed by Sergeant Matthews from ICIB on June 29, 2011. She stated she was Ms. [redacted] Parole Officer, but knew her as [redacted] Ms. [redacted] was shown a photograph of Ms. [redacted] and confirmed they were the same person. Ms. [redacted] stated she received Ms. [redacted] file on October 1, 2008, and she was a "Parolee at Large." She stated Ms. [redacted] was arrested on a warrant on June 29, 2009, and transferred to the [redacted] in Monrovia on August 13, 2009. Ms. [redacted] said Ms. [redacted] left the house the next day without authorization.

Ms. [redacted] said she was contacted by Deputy [redacted] on August 16, 2009, and he advised her he saw Ms. [redacted] associating with other gang members. She stated she requested a warrant for Ms. [redacted] on August 26, 2009, for being a Parolee at Large. She said Ms. [redacted] was arrested for the warrant on September 9, 2009.

Ms. [redacted] said she submitted the case to the Board of Prison Hearings who made the decision not to return Ms. [redacted] to prison, because she was close to her discharge date from parole (October 3, 2009.) The Board instead decided to extend Ms. [redacted] parole. Ms. [redacted] stated Ms. [redacted] case was transferred from her supervision to the Compton office on October 16, 2009, because Ms. [redacted] was moving. She was asked if she knew Subject Sullivan and she said she did not. She was asked if any other law enforcement officers contacted her about Ms. [redacted] and she said they did not.

IAB Note: For further information, see Sergeant Matthews' summary of the interview, (Exhibit A, pages 64-65). Ms. [redacted] interview was digitally recorded and copied to an audio CD, (Exhibit B).

Keith Duckett, Deputy District Attorney, Torrance Court, was interviewed by Sergeant Matthews' on January 10, 2011. The interview was conducted prior to Judge Eric Taylor's "Gag" order on all parties involved with the case on February 3, 2011.

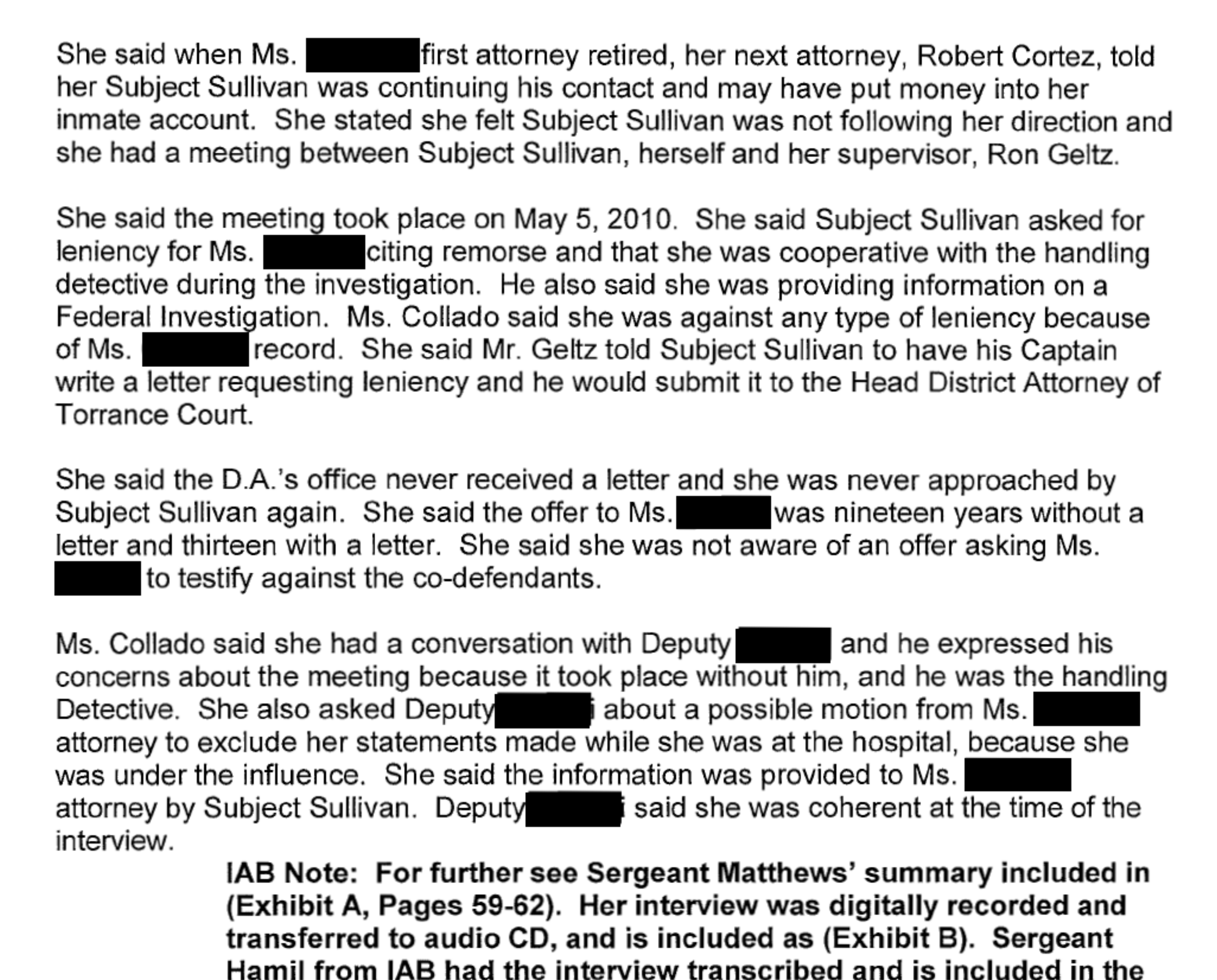
He was asked if he was contacted by anyone from the Sheriff's Department seeking leniency for Ms. [redacted] He said he was not, but he referred to attorney notes for the case. He said Ms. Collado, who handled the case through the Preliminary Hearing noted a request from Subject Sullivan requesting leniency for Ms. [redacted] He was asked if anyone made an offer of six years and he said an initial offer of six years was offered, but withdrawn after a full review of the file.

He also said Ms. [redacted] Attorney, Edward Geil, approached him asking about the Sheriff's Department locating the replica firearm used in the robbery. He said he was advised that Ms. [redacted] claimed that either Subject Sullivan or Deputy [redacted] found the replica and was going to write a report. Mr. Duckett said he contacted all of the deputies involved in the case and none were aware that a replica firearm was recovered. He said he spoke to all of them except for Subject Sullivan, who never returned his call.

IAB Note: For further information, see Sergeant Matthews' summary of the interview, (Exhibit A, page 48-49). Mr. Duckett's interview was not digitally recorded.

Siannah Collado, Deputy District Attorney, Inglewood Court, was interviewed by Sergeant Matthews on June 22, 2011. She stated she was assigned the case and responsible for the presentation of the case at preliminary hearing. She stated Subject Sullivan was the Gang Investigator utilized to prove the "Gang Allegation" in Ms. [redacted] case. She said he wrote a report and testified in court as an expert to show the crime in which Ms. [redacted] was involved in was committed to benefit a gang.

She stated Subject Sullivan stopped by the District Attorney's office on three to four times prior to the Preliminary Hearing to see what the offer was for the defendants. She stated she heard comments from Ms. [redacted] first attorney which caused her concern over Subject Sullivan's association with Ms. [redacted] She said Subject Sullivan was maintaining contact with Ms. [redacted] She said she told Subject Sullivan to discontinue his contact or he could cause a mistrial. Ms. Collado said Subject Sullivan told her it was Ms. [redacted] who was initiating the contact and they were discussing matters not related to the robbery case.



She said when Ms. [redacted] first attorney retired, her next attorney, Robert Cortez, told her Subject Sullivan was continuing his contact and may have put money into her inmate account. She stated she felt Subject Sullivan was not following her direction and she had a meeting between Subject Sullivan, herself and her supervisor, Ron Geltz.

She said the meeting took place on May 5, 2010. She said Subject Sullivan asked for leniency for Ms. [redacted] citing remorse and that she was cooperative with the handling detective during the investigation. He also said she was providing information on a Federal Investigation. Ms. Collado said she was against any type of leniency because of Ms. [redacted] record. She said Mr. Geltz told Subject Sullivan to have his Captain write a letter requesting leniency and he would submit it to the Head District Attorney of Torrance Court.

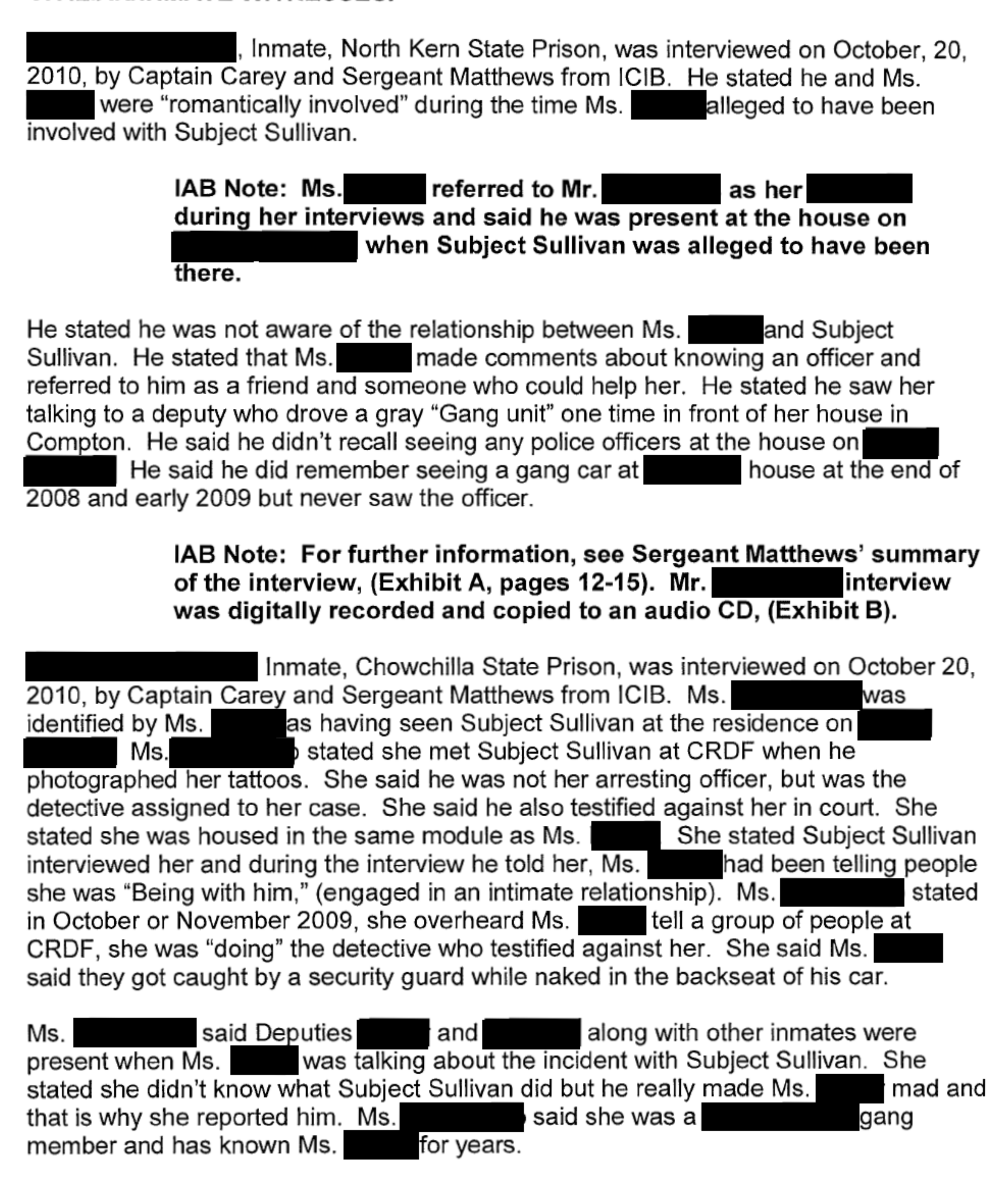
She said the D.A.'s office never received a letter and she was never approached by Subject Sullivan again. She said the offer to Ms. [redacted] was nineteen years without a letter and thirteen with a letter. She said she was not aware of an offer asking Ms. [redacted] to testify against the co-defendants.

Ms. Collado said she had a conversation with Deputy [redacted] and he expressed his concerns about the meeting because it took place without him, and he was the handling Detective. She also asked Deputy [redacted] about a possible motion from Ms. [redacted] attorney to exclude her statements made while she was at the hospital, because she was under the influence. She said the information was provided to Ms. [redacted] attorney by Subject Sullivan. Deputy [redacted] said she was coherent at the time of the interview.

> **IAB Note: For further see Sergeant Matthews' summary included in (Exhibit A, Pages 59-62). Her interview was digitally recorded and transferred to audio CD, and is included as (Exhibit B). Sergeant Hamil from IAB had the interview transcribed and is included in the IAB case book in the transcription section.**

Ms. Collado provided Sergeant Matthews copies of Subject Sullivan's Court transcripts, District Attorney case notes, and his Supplemental reports. The District Attorney case notes have comments from the May 5, 2010 meeting.

> **IAB Note: The documents are included in Exhibit A, pages 165-188.**



CIVILIAN/INMATE WITNESSES:

[redacted], Inmate, North Kern State Prison, was interviewed on October, 20, 2010, by Captain Carey and Sergeant Matthews from ICIB. He stated he and Ms. [redacted] were "romantically involved" during the time Ms. [redacted] alleged to have been involved with Subject Sullivan.

> **IAB Note: Ms. [redacted] referred to Mr. [redacted] as her [redacted] during her interviews and said he was present at the house on [redacted] when Subject Sullivan was alleged to have been there.**

He stated he was not aware of the relationship between Ms. [redacted] and Subject Sullivan. He stated that Ms. [redacted] made comments about knowing an officer and referred to him as a friend and someone who could help her. He stated he saw her talking to a deputy who drove a gray "Gang unit" one time in front of her house in Compton. He said he didn't recall seeing any police officers at the house on [redacted] He said he did remember seeing a gang car at [redacted] house at the end of 2008 and early 2009 but never saw the officer.

> **IAB Note: For further information, see Sergeant Matthews' summary of the interview, (Exhibit A, pages 12-15). Mr. [redacted] interview was digitally recorded and copied to an audio CD, (Exhibit B).**

[redacted] Inmate, Chowchilla State Prison, was interviewed on October 20, 2010, by Captain Carey and Sergeant Matthews from ICIB. Ms. [redacted] was identified by Ms. [redacted] as having seen Subject Sullivan at the residence on [redacted] Ms. [redacted] stated she met Subject Sullivan at CRDF when he photographed her tattoos. She said he was not her arresting officer, but was the detective assigned to her case. She said he also testified against her in court. She stated she was housed in the same module as Ms. [redacted] She stated Subject Sullivan interviewed her and during the interview he told her, Ms. [redacted] had been telling people she was "Being with him," (engaged in an intimate relationship). Ms. [redacted] stated in October or November 2009, she overheard Ms. [redacted] tell a group of people at CRDF, she was "doing" the detective who testified against her. She said Ms. [redacted] said they got caught by a security guard while naked in the backseat of his car.

Ms. [redacted] said Deputies [redacted] and [redacted] along with other inmates were present when Ms. [redacted] was talking about the incident with Subject Sullivan. She stated she didn't know what Subject Sullivan did but he really made Ms. [redacted] mad and that is why she reported him. Ms. [redacted] said she was a [redacted] gang member and has known Ms. [redacted] for years.

INTERNAL AFFAIRS BUREAU
INVESTIGATIVE SUMMARY

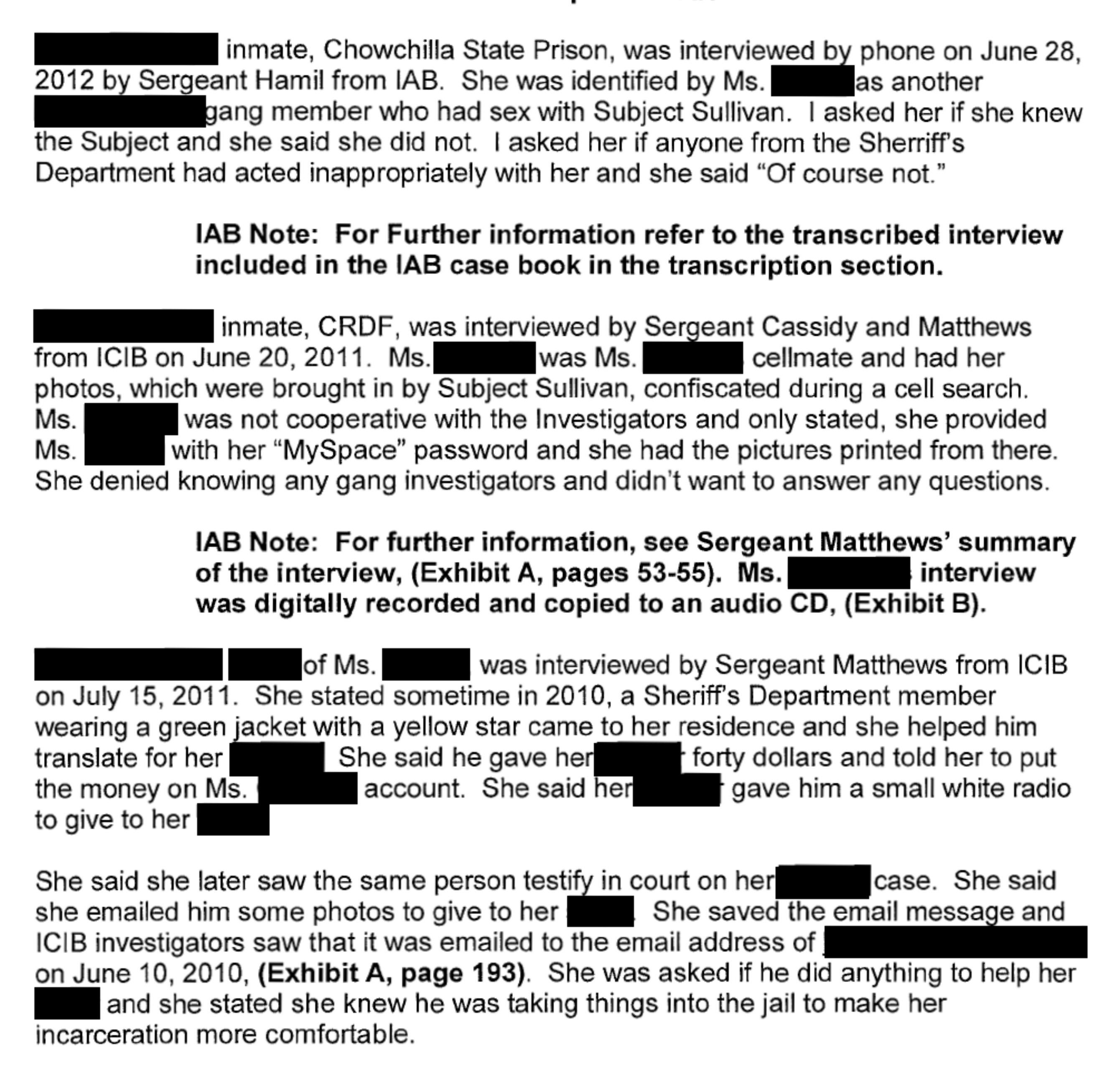
IAB Note: For further information, see Sergeant Matthews' summary of the interview, (Exhibit A, pages 15-18). Ms. [redacted] interview was digitally recorded and copied to an audio CD, (Exhibit B).

[redacted] inmate, Correctional Training Facility, Soledad, was interviewed by Captain Carey and Sergeant Matthews on October 21, 2010. Mr. [redacted] was identified by Ms. [redacted] to have seen Subject Sullivan at the residence on [redacted] and to have dropped her off at the Taco Bell when Ms. [redacted] had her first sexual encounter with the Subject. Mr. [redacted] said the Subject and Ms. [redacted] would share information and he would help Ms. [redacted] if she got in trouble or if her parole officer was going to check on her.

He said the first time he met the Subject was around August 2009. He said Ms. [redacted] called him because she ran out of gas at a medical clinic off of the Long Beach Freeway. He said when he got there he was "shocked" because he saw Ms. [redacted] and the Subject sitting in the front seat of the Subject's police car. He said the car was a blue "Town Car," with emergency lights and a computer in the front passenger area. He said Ms. [redacted] introduced them and they shook hands. He said the Subject brought her gas.

Mr. [redacted] said he saw the Subject again at Ms. [redacted] house on [redacted] He said he was "getting high," when someone told him to go outside. He said when he went outside, he saw Ms. [redacted] talking with the Subject. He said he drove Ms. [redacted] to the Taco Bell in San Pedro and dropped her off. He said they went to San Pedro because Ms. [redacted] didn't want anyone to see her and the Subject. He said he picked her up about three hours later. He said in September 2009, he went to the house on [redacted] and saw the same blue police car parked out front. He drove away and did not see the Subject. He said he called [redacted] and asked her why he was there and he said [redacted] said she didn't think he would mind.

Mr. [redacted] was asked if he provided girls with drugs in exchange for sex and he said "Yeah, Well that's part of the game." He was asked if he ever provided drugs to girls for Ms. [redacted], and he said if he was with other people and used drugs then had sex, it was "On them." He was asked what type of drugs he would supply to the girls and he said it was methamphetamine. He said Ms. [redacted] asked him to "hook-up" [redacted] with the Subject. He said [redacted] told him she only talked to the Subject, but Ms. [redacted] probably convinced [redacted] to have sex with the Subject. He stated that Ms. [redacted] admitted to him that she had sex with the Subject, and performed oral sex on him the night they met in San Pedro.



IAB Note: For further see Sergeant Matthews' summary included in (Exhibit A, Pages 18-23). His interview was digitally recorded and transferred to audio CD, and is included as (Exhibit B). Sergeant Hamil from IAB had the interview transcribed and is included in the IAB case book in the transcription section.

[redacted] inmate, Chowchilla State Prison, was interviewed by phone on June 28, 2012 by Sergeant Hamil from IAB. She was identified by Ms. [redacted] as another [redacted] gang member who had sex with Subject Sullivan. I asked her if she knew the Subject and she said she did not. I asked her if anyone from the Sherriff's Department had acted inappropriately with her and she said "Of course not."

IAB Note: For Further information refer to the transcribed interview included in the IAB case book in the transcription section.

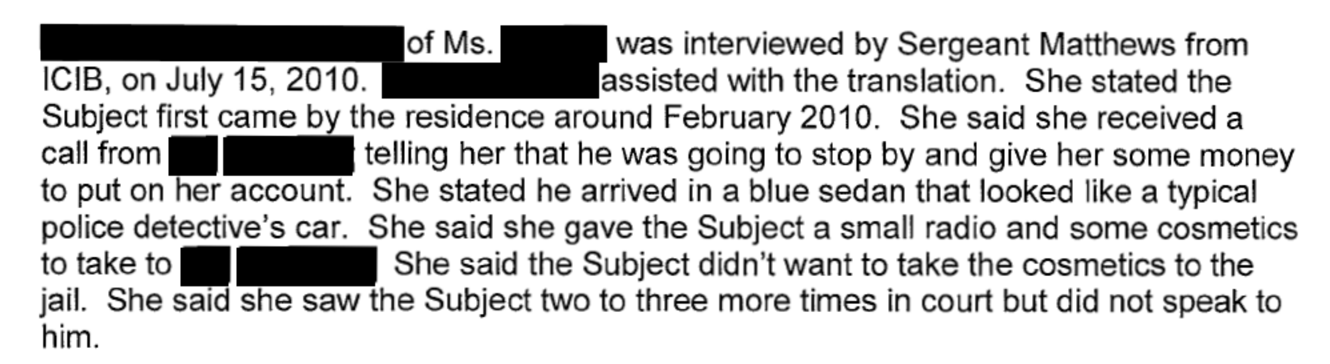
[redacted] inmate, CRDF, was interviewed by Sergeant Cassidy and Matthews from ICIB on June 20, 2011. Ms. [redacted] was Ms. [redacted] cellmate and had her photos, which were brought in by Subject Sullivan, confiscated during a cell search. Ms. [redacted] was not cooperative with the Investigators and only stated, she provided Ms. [redacted] with her "MySpace" password and she had the pictures printed from there. She denied knowing any gang investigators and didn't want to answer any questions.

IAB Note: For further information, see Sergeant Matthews' summary of the interview, (Exhibit A, pages 53-55). Ms. [redacted] interview was digitally recorded and copied to an audio CD, (Exhibit B).

[redacted] [redacted] of Ms. [redacted] was interviewed by Sergeant Matthews from ICIB on July 15, 2011. She stated sometime in 2010, a Sheriff's Department member wearing a green jacket with a yellow star came to her residence and she helped him translate for her [redacted] She said he gave her [redacted] forty dollars and told her to put the money on Ms. [redacted] account. She said her [redacted] gave him a small white radio to give to her [redacted]

She said she later saw the same person testify in court on her [redacted] case. She said she emailed him some photos to give to her [redacted] She saved the email message and ICIB investigators saw that it was emailed to the email address of [redacted] on June 10, 2010, **(Exhibit A, page 193)**. She was asked if he did anything to help her [redacted] and she stated she knew he was taking things into the jail to make her incarceration more comfortable.

IAB Note: For further see Sergeant Matthews' summary included in (Exhibit A, pages 66-67). Her interview was digitally recorded and transferred to audio CD, and is included as (Exhibit B). Sergeant Hamil from IAB had the interview transcribed and is included in the IAB case book in the transcription section.



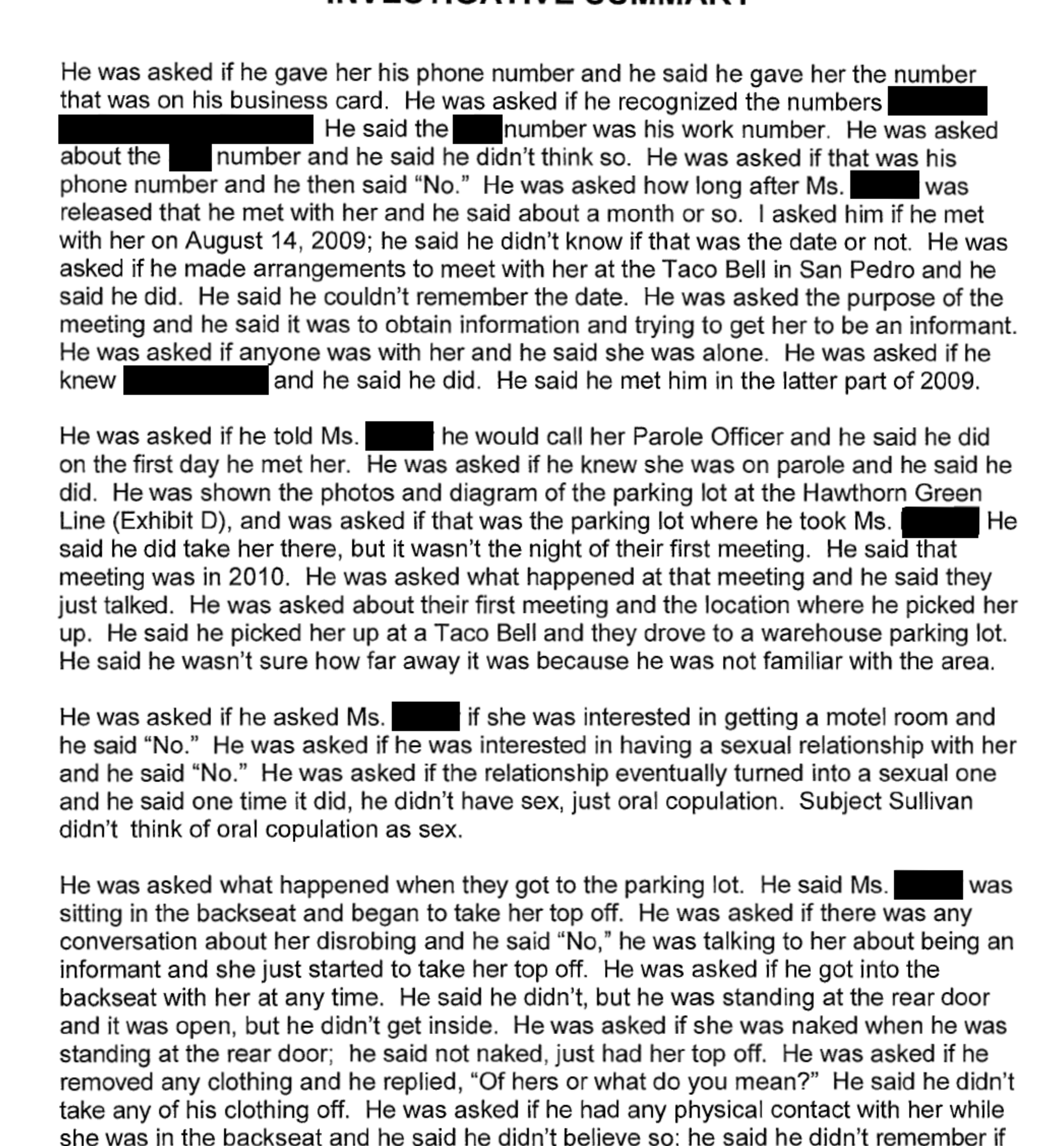
[redacted] of Ms. [redacted] was interviewed by Sergeant Matthews from ICIB, on July 15, 2010. [redacted] assisted with the translation. She stated the Subject first came by the residence around February 2010. She said she received a call from [redacted] telling her that he was going to stop by and give her some money to put on her account. She stated he arrived in a blue sedan that looked like a typical police detective's car. She said she gave the Subject a small radio and some cosmetics to take to [redacted] She said the Subject didn't want to take the cosmetics to the jail. She said she saw the Subject two to three more times in court but did not speak to him.

IAB Note: For further see Sergeant Matthews' summary included in (Exhibit A, pages 67-68). Her interview was digitally recorded and transferred to audio CD, and is included as (Exhibit B). Sergeant Hamil from IAB had the interview transcribed and is included in the IAB case book in the transcription section.

SUBJECT STATEMENT:

Subject Sullivan was interviewed June 19, 2012 at 1140hrs by I.A.B Sergeants Jeff Hamil and Slade Carrizosa. The interview was conducted at the Internal Affairs Bureau, interview room B. The Subject was represented by Ms. Helen Schwab from the law firm of Green and Shinee.

Subject Sullivan was asked if he knew Ms. [redacted] and he said he did. He was asked how he met her and he said he was looking for her as part of a [redacted] investigation. He said she was arrested on a parole warrant and he and his partner, Deputy [redacted] went to CRDF to interview her. He said he went there one time with Deputy [redacted] and he might have gone back by himself when she was re-arrested. He said he developed a business relationship with her and was trying to cultivate her as an informant. He said their relationship turned into a friendship. He was asked if while she was in custody if she ever asked him to retrieve personal property out of her car which had been impounded; he said she didn't. He was asked if he had any physical contact with her during the visits and he said "No." He said she asked him if there was any way she could make money and he said he told her she would have to sign up to be a paid informant. He said she didn't want to become a paid informant and he maybe had contact with her six times with her after that.



He was asked if he gave her his phone number and he said he gave her the number that was on his business card. He was asked if he recognized the numbers [redacted] He said the [redacted] number was his work number. He was asked about the [redacted] number and he said he didn't think so. He was asked if that was his phone number and he then said "No." He was asked how long after Ms. [redacted] was released that he met with her and he said about a month or so. I asked him if he met with her on August 14, 2009; he said he didn't know if that was the date or not. He was asked if he made arrangements to meet with her at the Taco Bell in San Pedro and he said he did. He said he couldn't remember the date. He was asked the purpose of the meeting and he said it was to obtain information and trying to get her to be an informant. He was asked if anyone was with her and he said she was alone. He was asked if he knew [redacted] and he said he did. He said he met him in the latter part of 2009.

He was asked if he told Ms. [redacted] he would call her Parole Officer and he said he did on the first day he met her. He was asked if he knew she was on parole and he said he did. He was shown the photos and diagram of the parking lot at the Hawthorn Green Line (Exhibit D), and was asked if that was the parking lot where he took Ms. [redacted] He said he did take her there, but it wasn't the night of their first meeting. He said that meeting was in 2010. He was asked what happened at that meeting and he said they just talked. He was asked about their first meeting and the location where he picked her up. He said he picked her up at a Taco Bell and they drove to a warehouse parking lot. He said he wasn't sure how far away it was because he was not familiar with the area.

He was asked if he asked Ms. [redacted] if she was interested in getting a motel room and he said "No." He was asked if he was interested in having a sexual relationship with her and he said "No." He was asked if the relationship eventually turned into a sexual one and he said one time it did, he didn't have sex, just oral copulation. Subject Sullivan didn't think of oral copulation as sex.

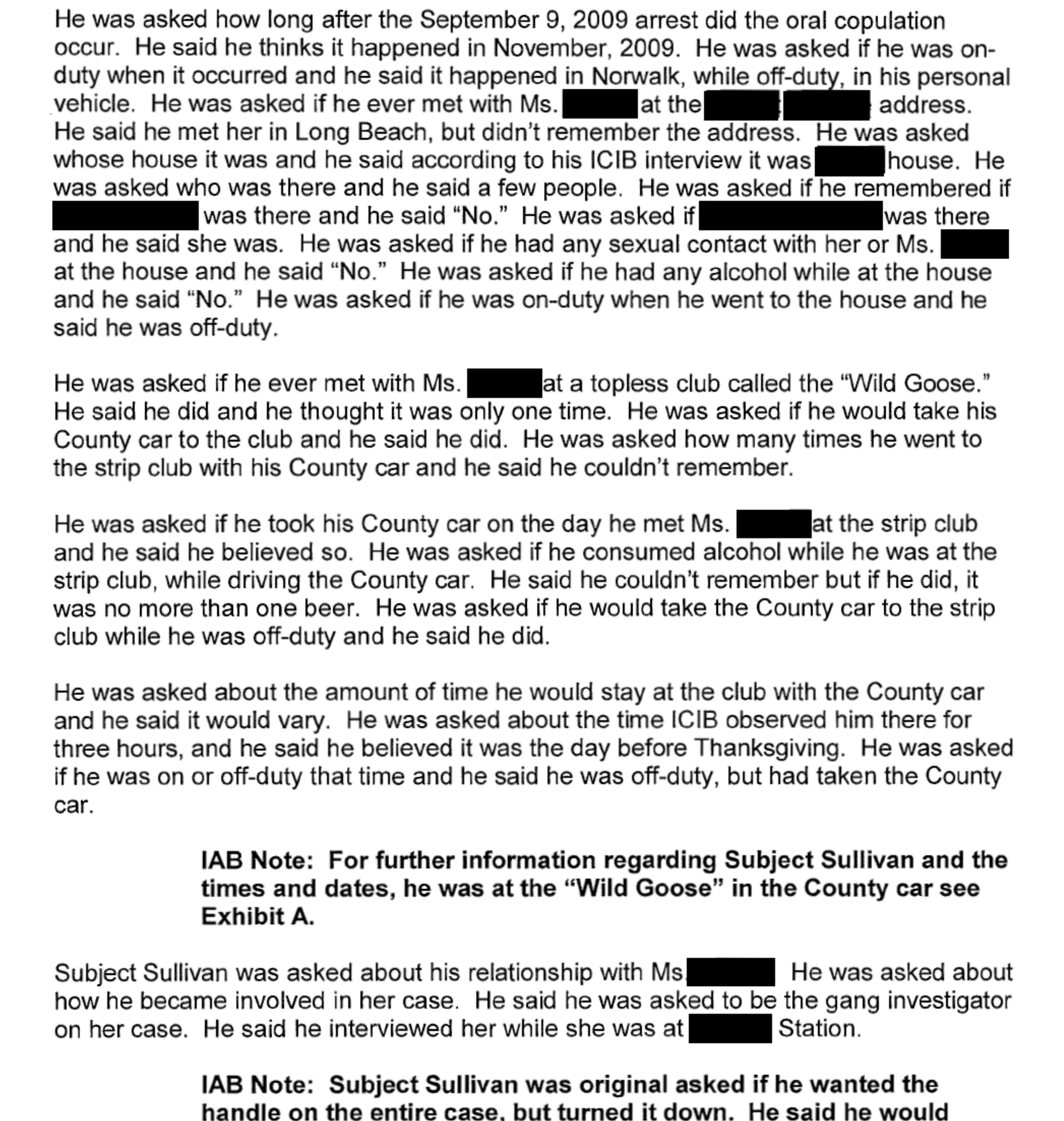
He was asked what happened when they got to the parking lot. He said Ms. [redacted] was sitting in the backseat and began to take her top off. He was asked if there was any conversation about her disrobing and he said "No," he was talking to her about being an informant and she just started to take her top off. He was asked if he got into the backseat with her at any time. He said he didn't, but he was standing at the rear door and it was open, but he didn't get inside. He was asked if she was naked when he was standing at the rear door; he said not naked, just had her top off. He was asked if he removed any clothing and he replied, "Of hers or what do you mean?" He said he didn't take any of his clothing off. He was asked if he had any physical contact with her while she was in the backseat and he said he didn't believe so; he said he didn't remember if he touched her or not.

He was asked if he kissed her while she was in the backseat and he said "No," and he said when he read the transcripts from his ICIB interview he said he did. He said he wanted to clarify that he couldn't remember if he kissed her that night or not; he didn't believe he kissed her that night. He was asked when did he kiss her and he said two to three months later. He was asked if the relationship turned into a sexual one and he said "Yes," he received oral copulation from her one time in 2010. He was asked if Ms. [redacted] was still naked when the security guard contacted them and he said he believed so. He said he was standing outside of the car when the security guard contacted them. He was asked how the meeting ended and he said he dropped her off back at the "Taco Bell." He was asked if they had any conversation about her conduct and he said he told her he wanted to keep their relationship professional.

He was asked if he ever had an informant act like this before and if it caused him concern. He said it should have caused him concern. He was asked if he ever notified anyone including a supervisor of the incident and he said "No," but he should have, looking back on the incident. He was asked if he ever ran Ms. [redacted] for warrants and he said he did prior to ever meeting with her. He was asked if he ever worked with informants before and he said he did. He was asked if he knew the Department's procedure on working with and documenting informants. He explained the proper procedure and said he didn't do that with Ms. [redacted]

He was asked if he ever checked license plates for Ms. [redacted] and he said he did. He said he ran one for sure and possibly two. He was asked why he ran the license plates; he said Ms. [redacted] wanted to know if the cars were stolen or not. He said the only information he gave her was whether or not the cars were stolen. He said he didn't give her any more information than that. He was asked if he ever checked or ran people for Ms. [redacted] and he said he couldn't remember for sure, if he did or not. He was asked if Ms. [redacted] was a gang member and he said she was. He said she was with [redacted]

He was asked if he had a conversation with Ms. [redacted] about her arrest on September 9, 2009. He said he didn't remember the phone call, he said he remembered getting phone calls from her, but could not remember exact phone calls. He was asked about the recorded conversation, where he said that his partner, Deputy [redacted] was mad at him. He was asked if Deputy [redacted] knew about his relationship with Ms. [redacted] and he said Deputy [redacted] did not know, but he was mad because he was just talking with her. He said he has a medical condition where he can't remember a lot as to names and dates. He said he has brain tumors and is currently taking medication. He said he is not saying the phone calls didn't happen, he just can't remember them.



He was asked how long after the September 9, 2009 arrest did the oral copulation occur. He said he thinks it happened in November, 2009. He was asked if he was on-duty when it occurred and he said it happened in Norwalk, while off-duty, in his personal vehicle. He was asked if he ever met with Ms. [redacted] at the [redacted] [redacted] address. He said he met her in Long Beach, but didn't remember the address. He was asked whose house it was and he said according to his ICIB interview it was [redacted] house. He was asked who was there and he said a few people. He was asked if he remembered if [redacted] was there and he said "No." He was asked if [redacted] was there and he said she was. He was asked if he had any sexual contact with her or Ms. [redacted] at the house and he said "No." He was asked if he had any alcohol while at the house and he said "No." He was asked if he was on-duty when he went to the house and he said he was off-duty.

He was asked if he ever met with Ms. [redacted] at a topless club called the "Wild Goose." He said he did and he thought it was only one time. He was asked if he would take his County car to the club and he said he did. He was asked how many times he went to the strip club with his County car and he said he couldn't remember.

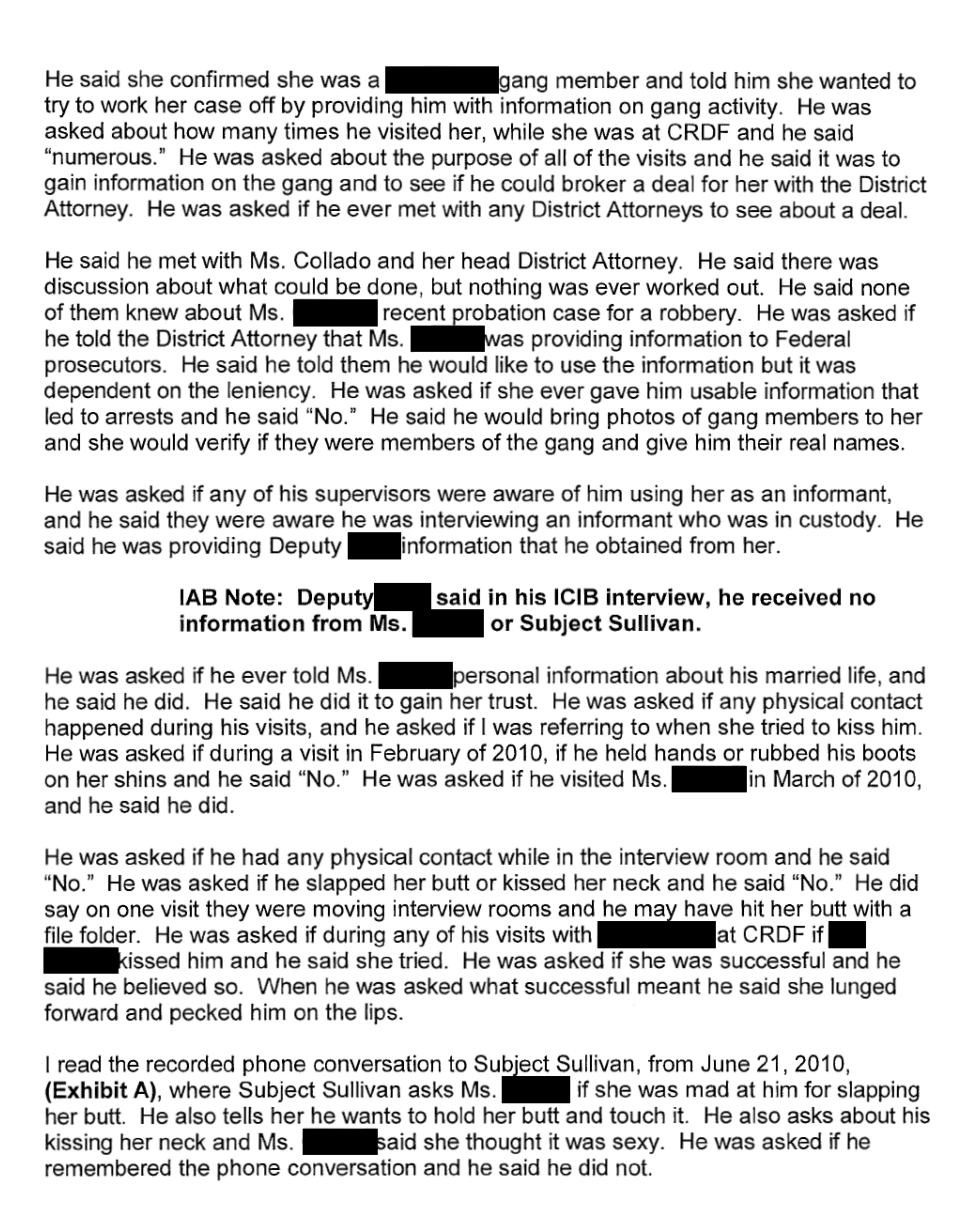
He was asked if he took his County car on the day he met Ms. [redacted] at the strip club and he said he believed so. He was asked if he consumed alcohol while he was at the strip club, while driving the County car. He said he couldn't remember but if he did, it was no more than one beer. He was asked if he would take the County car to the strip club while he was off-duty and he said he did.

He was asked about the amount of time he would stay at the club with the County car and he said it would vary. He was asked about the time ICIB observed him there for three hours, and he said he believed it was the day before Thanksgiving. He was asked if he was on or off-duty that time and he said he was off-duty, but had taken the County car.

> **IAB Note: For further information regarding Subject Sullivan and the times and dates, he was at the "Wild Goose" in the County car see Exhibit A.**

Subject Sullivan was asked about his relationship with Ms. [redacted] He was asked about how he became involved in her case. He said he was asked to be the gang investigator on her case. He said he interviewed her while she was at [redacted] Station.

> **IAB Note: Subject Sullivan was original asked if he wanted the handle on the entire case, but turned it down. He said he would conduct the gang investigation.**



He said she confirmed she was a [redacted] gang member and told him she wanted to try to work her case off by providing him with information on gang activity. He was asked about how many times he visited her, while she was at CRDF and he said "numerous." He was asked about the purpose of all of the visits and he said it was to gain information on the gang and to see if he could broker a deal for her with the District Attorney. He was asked if he ever met with any District Attorneys to see about a deal.

He said he met with Ms. Collado and her head District Attorney. He said there was discussion about what could be done, but nothing was ever worked out. He said none of them knew about Ms. [redacted] recent probation case for a robbery. He was asked if he told the District Attorney that Ms. [redacted] was providing information to Federal prosecutors. He said he told them he would like to use the information but it was dependent on the leniency. He was asked if she ever gave him usable information that led to arrests and he said "No." He said he would bring photos of gang members to her and she would verify if they were members of the gang and give him their real names.

He was asked if any of his supervisors were aware of him using her as an informant, and he said they were aware he was interviewing an informant who was in custody. He said he was providing Deputy [redacted] information that he obtained from her.

> **IAB Note: Deputy [redacted] said in his ICIB interview, he received no information from Ms. [redacted] or Subject Sullivan.**

He was asked if he ever told Ms. [redacted] personal information about his married life, and he said he did. He said he did it to gain her trust. He was asked if any physical contact happened during his visits, and he asked if I was referring to when she tried to kiss him. He was asked if during a visit in February of 2010, if he held hands or rubbed his boots on her shins and he said "No." He was asked if he visited Ms. [redacted] in March of 2010, and he said he did.

He was asked if he had any physical contact while in the interview room and he said "No." He was asked if he slapped her butt or kissed her neck and he said "No." He did say on one visit they were moving interview rooms and he may have hit her butt with a file folder. He was asked if during any of his visits with [redacted] at CRDF if [redacted] kissed him and he said she tried. He was asked if she was successful and he said he believed so. When he was asked what successful meant he said she lunged forward and pecked him on the lips.

I read the recorded phone conversation to Subject Sullivan, from June 21, 2010, **(Exhibit A)**, where Subject Sullivan asks Ms. [redacted] if she was mad at him for slapping her butt. He also tells her he wants to hold her butt and touch it. He also asks about his kissing her neck and Ms. [redacted] said she thought it was sexy. He was asked if he remembered the phone conversation and he said he did not.

IAB Note: Subject Sullivan said during his ICIB interview, he might have kissed her neck, but couldn't remember for sure.

He was asked if he kissed her, touched her butt or kissed her neck and he said he did not. He was asked why he would say it if it didn't happen and he said he didn't know what he was talking about but he didn't do it.

He was asked if he ever talked to the District Attorney about reducing Ms. [redacted] sentence because she was under the influence when she gave her statement. He said "No," he asked her if it affected the case if she was under the influence. He was asked if he talked to Deputy [redacted] about reducing or helping Ms. [redacted] sentence. He said he spoke to him and asked if she gave him information, if he would mind if he tried to get her a reduced sentence. He said Deputy [redacted] stated he didn't have a problem with it.

IAB Note: Deputy [redacted] stated during his ICIB interview, he went to the District Attorney and asked if a deal had been worked out and was upset because he was not included. He said he was not contacted by Subject Sullivan.

Subject Sullivan was asked about going to Ms. [redacted] mother's house. He said he went once, maybe twice because the [redacted] called the station and asked to speak to him. He said he went to her house and Ms. [redacted] asked about her [redacted] case. He said she didn't speak English and the [redacted], [redacted], had to translate for them. He said he told the [redacted] just the basics of the case and the [redacted] asked him to take Ms. [redacted] a letter. He said he took the letter and asked some Custody Assistant at CRDF if it was "Ok."

He said the [redacted] emailed him some photos, which he printed up and also took them to Ms. [redacted]. I confirmed with Subject Sullivan the email address of ([redacted]), that [redacted] sent the photos to belonged to him. He was asked if he gave the [redacted] any money to put on Ms. [redacted] books and he said "No." He was asked if they ever asked him to take items to Ms. [redacted] and he said they asked him to take Ms. [redacted] some make-up and stuff but he said he couldn't.

Subject Sullivan was asked if he notified any of his supervisors of his medical condition and how the medication was affecting him. He said he notified his sergeant that he was taking medication. His Attorney said he was not aware of how the medication was affecting him. He was asked about his statement to ICIB, explaining the reason for his semen in the backseat, (No Semen was recovered from the backseat). He said he and his wife had sex in the back of his County car. He was asked where and when it occurred and he replied while his car was parked in his garage and he was off-duty. The Interview was terminated at 1335 hrs.



Leroy D. Baca, Sheriff

County of Los Angeles

Sheriff's Department Headquarters

4700 Ramona Boulevard
Monterey Park, California 91754-2169



August 22, 2012

Deputy Richard Sullivan, [redacted]
[redacted]

Dear Deputy Sullivan:

You are hereby notified that it is the intention of the Sheriff's Department to discharge you from your position of Deputy Sheriff, Item No. 2708A, with this Department, effective the close of business September 13, 2012.

An investigation under IAB File Number IV 2278603, conducted by Internal Affairs Bureau, coupled with your own statements, has established the following:

1. That, in violation of Manual of Policy and Procedures Sections 3-01/050.85, Fraternization; and/or 3-01/050.90, Prohibited Association; and/or 3-01/050.85 Fraternization and Prohibited Association; and/or 3-0/050.10, Performance to Standards; and/or 3-01/030.05, General Behavior; and/or 3-01/030.07, Immoral Conduct; and/or 3-01/030.10, Obedience to Laws, Regulations and Orders; and/or 3-01/100.45, Use of Communications Equipment as it pertains to 3-07/220.00, Prohibitions; and/or 3-01/040.95, Confidential Information, on or about June 30, 2009 through November 17, 2010, while assigned to the Operations Safe Streets Bureau, you were involved in a personal relationship, and/or sexual relationship with [redacted] who was incarcerated in the Century Regional Detention Facility, and/or on parole, and/or a known gang member, and/or a known drug user, while failing to conform to the work standards established for your position while bringing discredit to yourself or the Department, and/or performing in violation of the regulations of the Department, and/or accessing the Departmental Data System Network for non-work related purposes, and/or providing confidential information to non-department members, as evidenced by, but not limited to:

a. engaging in inappropriate physical contact with a person while they were incarcerated and/or rubbing her thighs, and/or touching her leg with your boot, and/or stating she was pretty, and/or;

b. retrieving a camera from a car as a personal favor for a person incarcerated, and/or;

c. providing phone numbers as a means to further a personal relationship, and/or;

d. contacting and maintaining a personal relationship with a person recently released from Century Regional Detention Facility, and/or;

e. failing to notify the Unit Commander of the personal relationship, and/or obtain written authorization, and/or;

f. engaging and willfully maintaining a personal relationship with a parolee, and/or known drug user and/or known gang member, and/or;

g. admitted being orally copulated by Ms. [redacted], and/or;

h. checking and providing confidential information obtained from the Sheriff's Data Systems Network to a non-department member, and/or;

i. driving your county vehicle, while off duty to a strip club [redacted] and meeting with Ms [redacted].

2. That, in violation of Manual of Policy and Procedures Sections 3-01/050.85, Fraternization; and/or 3-01/050.90, Prohibited Association; and/or 3-01/050.85, Fraternization and Prohibited Association; and/or 3-0/050.10, Performance to Standards; and/or 3-01/030.05, General Behavior; and/or 3-01/030.10 Obedience to Laws, Regulations and Orders and as it pertains to the Custody Division Manual Section 3-01/090.05, Personal Phones; and/or 3-01/030.37, Unnecessary/Inappropriate Interference in an Investigation; and/or 3-01/040.76, Obstructing an Investigation/Influencing a Witness; and/or 3-01/030.15, Conduct Toward Others; and/or, 3-01/030.07, Immoral Conduct; and/or 3-01/030.85, Derogatory Language, on or about January 10, 2010 through September 29, 2010, while assigned to the Operations Safe Streets Bureau, you were involved in a personal relationship with [redacted] who was incarcerated in the Century

Regional Detention Facility, and/or a known gang member, while failing to conform to the work standards established for your position, while bringing discredit to yourself or the Department, and/or performing in violation of the regulations of the Department, and/or contacting district attorney officials to gain favor for Ms. [redacted], and/or treating persons in a disrespectful manner, and/or failing to maintain a level of moral conduct while performing business affairs, and/or using coarse, profane, or insulting language, as evidenced by, but not limited to:

a. engaging in inappropriate physical contact with a person while they were incarcerated by rubbing her hands, and/or touching her leg with your boot, and/or poking her hand, and/or grabbing her waist, and/or kissing her neck, and/or kissing her, and/or fondling her breast, and/or squeezing her buttocks, and/or groping your penis in the presence of a incarcerated person, and/or;

b. using language to the effect of but not limited to "fuck," and/or "fuckin," and/or "bitch," and/or;

c. entering a secured custody area with a cellphone, and/or;

d. allowing a person while they were incarcerated to use a cellphone, and/or;

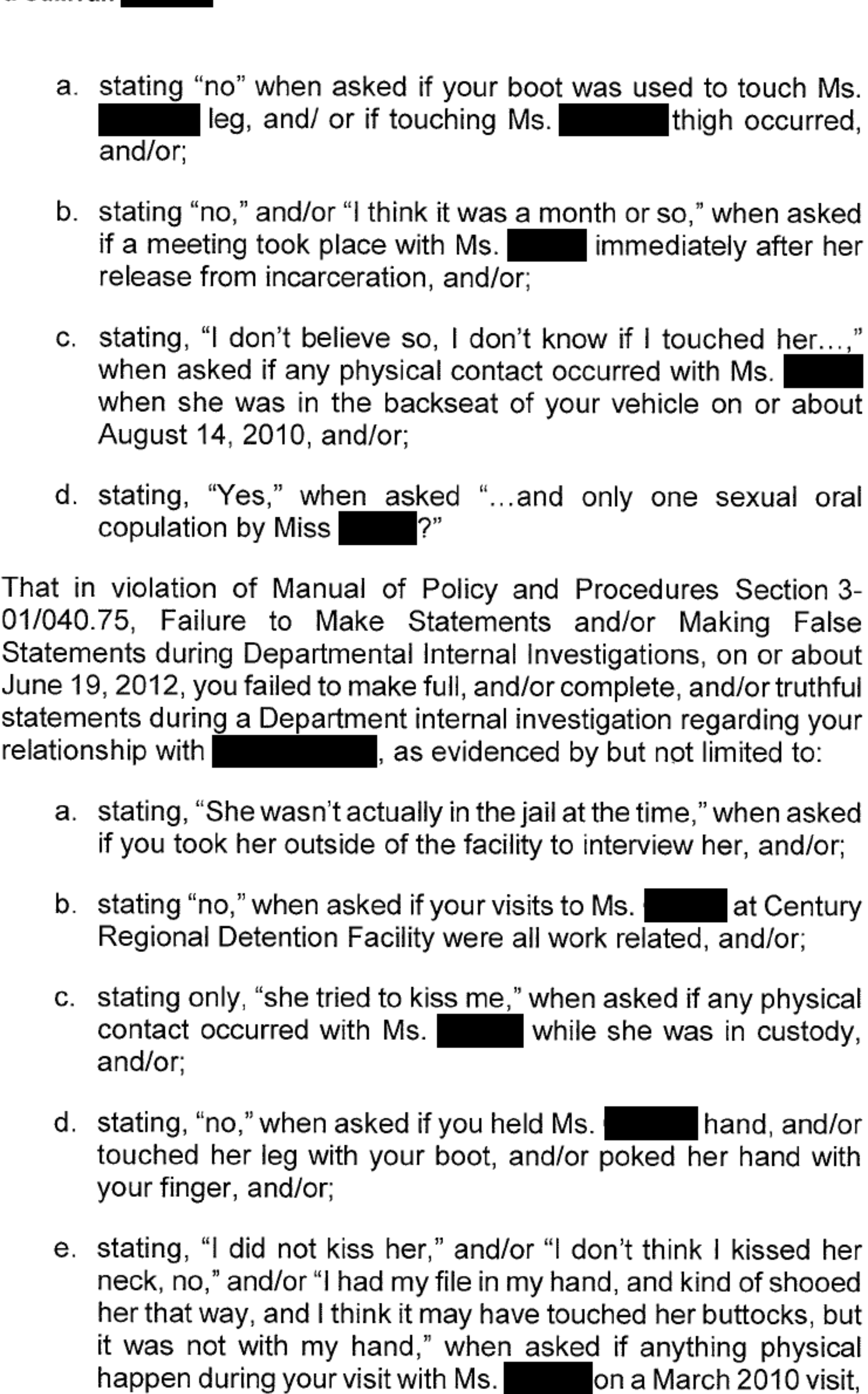
e. providing phone numbers as a means to further a personal relationship, and/or;

f. arranging for, retrieving and delivering personal items and/or supplying monies for a person while she was incarcerated, and/or;

g. contacting district attorney officials to gain favorable terms for a Ms. [redacted] while she was incarcerated, and/or for a known gang member, and/or;

h. failing to notify the Unit Commander of the personal relationship, and/or obtain written authorization.

3. That in violation of Manual of Policy and Procedures Section 3-01/040.75, Failure to Make Statements and/or Making False Statements during Departmental Internal Investigations, on or about June 19, 2012, you failed to make full, and/or complete, and/or truthful statements during a Department internal investigation regarding your relationship with [redacted] as evidenced by but not limited to:



a. stating "no" when asked if your boot was used to touch Ms. [redacted] leg, and/ or if touching Ms. [redacted] thigh occurred, and/or;

b. stating "no," and/or "I think it was a month or so," when asked if a meeting took place with Ms. [redacted] immediately after her release from incarceration, and/or;

c. stating, "I don't believe so, I don't know if I touched her...," when asked if any physical contact occurred with Ms. [redacted] when she was in the backseat of your vehicle on or about August 14, 2010, and/or;

d. stating, "Yes," when asked "...and only one sexual oral copulation by Miss [redacted]?"

4. That in violation of Manual of Policy and Procedures Section 3-01/040.75, Failure to Make Statements and/or Making False Statements during Departmental Internal Investigations, on or about June 19, 2012, you failed to make full, and/or complete, and/or truthful statements during a Department internal investigation regarding your relationship with [redacted], as evidenced by but not limited to:

a. stating, "She wasn't actually in the jail at the time," when asked if you took her outside of the facility to interview her, and/or;

b. stating "no," when asked if your visits to Ms. [redacted] at Century Regional Detention Facility were all work related, and/or;

c. stating only, "she tried to kiss me," when asked if any physical contact occurred with Ms. [redacted] while she was in custody, and/or;

d. stating, "no," when asked if you held Ms. [redacted] hand, and/or touched her leg with your boot, and/or poked her hand with your finger, and/or;

e. stating, "I did not kiss her," and/or "I don't think I kissed her neck, no," and/or "I had my file in my hand, and kind of shooed her that way, and I think it may have touched her buttocks, but it was not with my hand," when asked if anything physical happen during your visit with Ms. [redacted] on a March 2010 visit, and/or;

f. stating, "no," when asked if you ever kissed Ms. [redacted] on the neck while visiting her in the Century Regional Detention Facility, and/or;

g. stating, "no," when asked if you provided money to be placed on Ms. [redacted] books, and/or;

h. stating, "that's correct," when asked "one last time, no kissing, grabbing of the butt, or breast with Ms. [redacted]...," and/or;

i. stating that you spoke to Detective [redacted] regarding your efforts to promote Ms. [redacted] and gain leniency from the District Attorney's Office on her pending case, and/or;

j. stating you provided Detective [redacted] with information you obtained from your relationship with [redacted]

Additional facts and grounds for this decision are set forth in the Disposition Worksheet, Investigative Summary and Investigative Packets which are incorporated herein by reference.

You may respond to the intended action orally or in writing. In the event that you choose to respond orally to these charges, you have already been scheduled to meet with Chief James Lopez, on September 11, 2012 at 1030 hours, in his office, which is located at 4700 Ramona Boulevard, Monterey Park California 91754. If you are unable to appear at the scheduled time and wish to schedule some other time prior to September 11, 2012, for your oral response, please call Chief Lopez' secretary at [redacted] for an appointment.

If you choose to respond in writing, please call Chief Lopez' secretary to cancel your scheduled appointment, and send your response to the facts contained in this letter to Chief Lopez' office by no later than September 11, 2012.

Unless you are currently on some other type of authorized leave, pursuant to Rule 16.01 of the Los Angeles County Civil Service Commission Rules, effective immediately, you are on paid administrative leave which will continue during the fifteen (15) business days you have to respond to the intended discharge or until the conclusion of your pre-disciplinary hearing. If you are presently on an authorized leave, that leave will continue during the fifteen (15) business days you have to respond to the intended discharge, or until the conclusion of your pre-disciplinary hearing.

Failure to respond to this Letter of Intent within fifteen (15) business days will be considered a waiver of your right to respond and will result in the imposition of the discipline indicated herein.

If you did not receive the investigative material on which your discipline is based at the time you were served with this correspondence, you may contact the Internal Affairs Bureau at (323) 890-5300, to obtain a copy of the case file.

The Sheriff's Department reserves the right to amend and/or add to this letter.

Sincerely,

LEROY D. BACA, SHERIFF

John H. Clark, Captain
Internal Affairs Bureau

Note: Attached for your convenience are excerpts of the applicable areas of the Manual of Policy and Procedures.

JHC:pmp

c: Advocacy Unit
Employee Relations Unit
James R. Lopez, Chief, Field Operations Region II
Internal Affairs Bureau
Office of Independent Review (OIR)
(File #IV2278603)

LO ANGELES COUNTY DISTRICT AT RNEY
CHARGE EVALUATION WORKSHEET

X FELONY MISDEMEANOR	AGENCY NAME LASD - INTERNAL AFFAIRS AGENCY FILE NO. (DR OR URN) 910-00041-2003-441	DA CASE NO. 31076733 DA OFFICE CODE J.S.I.D. 11-0513R	DATE 08/30/2011 VICTIM ASSISTANCE REFERRAL ☐ YES – NOTIFY VWAP ☐ NO

SUSP NO.	SUSPECT	CODE	SECTION	OFFENSE DATE	REASON CODE
1	NAME (LAST, FIRST MIDDLE)) SULLIVAN, RICHARD	PC PC	289.6 182	01/01/2010 01/01/2010	B B
	DOB: / SEX (M/F): M / BOOKING NO.:	VIP -- Yes X No			
	___ Gang Member Name of Gang	___ Victim Gang Member Name of Gang:			
	Victim Name:	Victim DOB:			
2	NAME (LAST, FIRST MIDDLE))				
	DOB / SEX (M/F) / BOOKING NO.	VIP -- Yes -- No			
	Gang Member Name of Gang	___ Victim Gang Member Name of Gang:			
	Victim Name:	Victim DOB:			
3	NAME (LAST, FIRST MIDDLE))				
	DOB / SEX (M/F) / BOOKING NO.	VIP -- Yes -- No			
	Gang Member Name of Gang	___ Victim Gang Member Name of Gang:			
	Victim Name:	Victim DOB:			

Comments
SEE ATTACHED.

COMPLAINT DEPUTY (print)	COMPLAINT DEPUTY (SIGNATURE)	STATE BAR NO.	REVIEWING DEPUTY (SIGNATURE)
JAMES W. GARRISON/smm	[signature]	157070	[signature] Sergio Gonzalez

I have conveyed all relevant information to the above-named Deputy District Attorney to be used in consideration of a filing decision.

FILING OFFICER (PRINT): SGT. KELLY MATTHEWS/L.A.S.D. FILING OFFICER (SIGNATURE): MAILED 08/31/11 SERIAL #: [redacted]

DEPARTMENT OF JUSTICE REASON CODES (FORM 8715)			DISTRICT ATTORNEY'S REASON CODES
A. Lack of Corpus B. Lack of Sufficient Evidence C. Inadmissible Search/Seizure	D. Victim Unavailable/Declines To Testify E. Witness Unavailable/Declines to Testify F. Combined with Other Counts/Cases G. Interest of Justice	H. Other (indicate the reason in Comments section) I. Referred to Non-California Jurisdiction J. Deferred for Revocation of Parole K. Further Investigation	L. Prosecutor Prefiling Deferral M. Probation Violation filed in lieu of N. Referred to City Attorney for Misdemeanor Consideration

LAST NAME: SULLIVAN FIRST NAME: RICHARD DA CASE NUMBER: 31076733

COPY

In the matter of the proposed discipline of	)	
	)	
Richard Sullivan, Employee No. 433968	)	
	)	**SETTLEMENT**
and	)	**AGREEMENT**
	)	
the Los Angeles County Sheriff's Department	)	
	)	

PRELIMINARY STATEMENT

This agreement is entered into between the Los Angeles County Sheriff's Department (hereinafter referred to as "Department") and Richard Sullivan, Employee No. [redacted] (hereinafter referred to as "Mr. Sullivan").

RECITALS

The Department and Mr. Sullivan are interested parties in the investigation under Internal Affairs Bureau No. 2278603. Both desire to resolve all disputes arising as the result of that investigation, avoid litigation, and further the administrative process upon the terms and conditions hereinafter set forth.

NOW THEREFORE, the Department and Mr. Sullivan, for and in consideration of the mutual covenants herein, agree as follows:

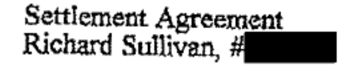
1. Upon execution of this Agreement, the Department agrees to rescind its intended discharge action in regard to IAB Case No. 2278603.

   A. Mr. Sullivan agrees to submit a signed resignation form (Exhibit A) with an effective resignation date on October 24, 2012. There are no considerations or issues concerning "back-pay."

   B. Upon execution of this settlement agreement and until his official resignation date on October 24, 2012, Mr. Sullivan will be considered on approved leave with pay.

2. Mr. Sullivan's personnel file will reflect he resigned from the Department effective October 24, 2012. This file will reflect that IAB Case No. 2278603 is considered "closed." The case file will not be "sealed."

3. Mr. Sullivan's Personnel Performance Index will reflect, "Founded, Resigned" as


Settlement Agreement
Richard Sullivan, #[redacted]

to violations of Manual Policy and Procedures §§ 3-01/050.85, Fraternization; and/or 3-01/050.90, Prohibited Association; and/or 3-01/050.85 Fraternization and Prohibited Association; and/or 3-0/050.10, Performance to Standards; and/or 3-01/030.05, General Behavior; and/or 3-01/030.07, Immoral Conduct; and/or 3-01/030.10, Obedience to Laws, Regulations and Orders; and as such section pertains to the Custody Division Manual Section 3-01/090.05, Personal Phones and/or 3-01/100.45, Use of Communications Equipment as it pertains to 3-07/220.00, Prohibitions; and/or 3-01/040.95, Confidential Information; and/or 3-01/030.37, Unnecessary/Inappropriate Interference in an Investigation; and/or 3-01/040.76, Obstructing an Investigation/Influencing a Witness; and/or 3-01/030.15, Conduct Towards Others; and/or, 3/01/030.85, Derogatory Language; Section 3-01/040.75, Failure to Make Statements and/or Making False Statements during Departmental Internal Investigations.

4. The Parties agree, understand, and acknowledge that Mr. Sullivan will not be eligible for any employment position with the County of Los Angeles.

5. Mr. Sullivan agrees to waive any and all future administrative and/or judicial remedies involving or pertaining to either the discharge and/or IAB No. 2278603 including but not limited to, appeals to the Los Angeles County Civil Service Commission and/or the Los Angeles County Employee Relations Commission.

6. The parties further agree this settlement shall not be considered, cited or used in future disputes as establishing past precedent or past employment practice. This agreement resolves the dispute between Mr. Sullivan and the Department, and is not to be applied to any other facts or disputes.

7. In consideration of the terms and conditions set forth herein, Mr. Sullivan agrees to fully release, acquit and forever discharge the County, and all present and former officers, employees and agents of the County and their heirs, successors, assigns and legal representatives from any and all liability whatsoever for any and all claims arising out of or connected with the employment relationship between the County and Mr. Sullivan. Additionally, Mr. Sullivan specifically acknowledges that he has not been the subject of discrimination in any form, including, but not limited to, discrimination based upon age, race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, marital status, parental status, or sex, and that he has no claim against the Department for any such discrimination, whether any such claim is presently known or not known by him.

8. Mr. Sullivan further agrees to relinquish and expressly waives all rights conferred upon him by the provisions of California Civil Code Section 1542, which reads as follows:

"A general release does not extend to claims which the creditor does not know or suspect to exist in his favor at the time of executing the release, which if known by him must have materially affected his settlement with the debtor."

9. Each party hereto represents and agrees he or she has carefully read and fully understands all of the provisions of the agreement, and he or she is voluntarily, without any duress or undue influence on the part of or on behalf of any party, entering into this agreement.

10. This agreement may be executed in one or more counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument. A photocopy or facsimile transmission of the agreement, including signatures, shall be deemed to constitute evidence of the agreement having been executed.

11. The date of the last signature placed hereon shall hereinafter be known as the "date of execution" and the "effective date" of this agreement.

12. The parties agree the foregoing comprises the entire agreement between the parties and there have been no other promises made by any party. Any modification of this agreement must be in writing.

I have read the foregoing Settlement Agreement, and I accept and agree to the provisions contained therein and hereby execute it voluntarily and with full understanding of its consequences.

Richard Sullivan, #[redacted] Date 10/24/12

For the Department:

James R. Lopez, Chief
Field Operations Region II

Date 10/25/12